

MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

**FINANCIAL STATEMENTS AND
SUPPLEMENTARY INFORMATION
YEAR ENDED JUNE 30, 2021**

**WITH
REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS**





MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

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REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

The Honorable County Council of Montgomery County, Maryland
Board of Trustees
Montgomery County Consolidated Retiree Health Benefits Trusts

Report on the Financial Statements

We have audited the accompanying statement of fiduciary net position of Montgomery County Consolidated Retiree Health Benefits Trusts (the Trust) as of June 30, 2021, and the related statements of changes in fiduciary net position for the year then ended and the related notes to the financial statements, as listed in the table of contents.

Management's Responsibility for the Financial Statements

The Trust's management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal controls relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the basic financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal controls relevant to the entity's preparation and fair presentation of the basic financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal controls. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the basic financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the fiduciary net position of the Trust as of June 30, 2021, and the respective changes in its fiduciary net position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis and the schedules of changes in the net OPEB liability and related ratios, employer contributions and investment returns and related notes, as listed in the table of contents, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated September 30, 2021 on our consideration of the Trust's internal controls over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal controls over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of internal controls over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Trust's internal controls over financial reporting and compliance.

Owings Mills, Maryland
September 30, 2021

SB + Company, LLC

MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

MANAGEMENT'S DISCUSSION AND ANALYSIS

INTRODUCTION

The following Management's Discussion and Analysis (MD&A) of the Montgomery County Consolidated Retiree Health Benefits Trust (Trust) financial performance provides an introduction to the financial statements of the Trust as of and for the year ended June 30, 2021.

Since the MD&A is designed to focus on current activities, resulting changes and current known facts, it should be read in conjunction with the financial statements, notes to the financial statements and required supplementary information which follow this discussion.

REQUIRED FINANCIAL STATEMENTS

The financial statements for the Trust have been prepared under the accrual basis of accounting in conformity with U.S. generally accepted accounting principles, promulgated by the Governmental Accounting Standards Board. The Statement of Fiduciary Net Position comprises the Trust's assets and liabilities and provides information about the nature and amount of investments, as well as the liabilities. The Statement of Changes in Fiduciary Net Position reports the changes in the Trust's net position, measured by the additions by major sources and deductions by type.

FINANCIAL ANALYSIS OF THE CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

Shown below is a condensed presentation of the net position of the Consolidated Retiree Health Benefits Trust at June 30:

Net Position (Millions)				
	<u>2021</u>	<u>2020</u>	<u>Percentage Change</u>	
ASSETS				
Cash and investments	\$ 1,648.8	\$ 1,224.7	34.6	%
Receivables	<u>11.4</u>	<u>25.6</u>	(55.6)	
Total assets	<u>1,661.2</u>	<u>1,250.3</u>	32.8	
LIABILITIES				
Claims payable	4.4	4.4	0.0	
Other liabilities	<u>17.3</u>	<u>14.5</u>	19.4	
Total liabilities	<u>21.7</u>	<u>18.9</u>	14.8	
NET POSITION	<u>\$ 1,638.5</u>	<u>\$ 1,231.4</u>	33.1	%

Net position held in the Trust as of June 30, 2021 increased 33.1 percent to \$1,638.5 million primarily attributed to contributions made to the Trust and investment returns achieved by the Trust. Receivables decreased 55.6 percent to \$11.4 million due to payments related to rebates from prescription drugs and the Medicare Part D programs. Other liabilities increased 19.4 percent to \$17.3 million mainly related with increase in cash collateral on security lending.

Shown below is a condensed presentation of the change in net position of the Consolidated Retiree Health Benefits Trust for the years ended June 30:

Change in Net Position (Millions)			
	<u>2021</u>	<u>2020</u>	<u>Percentage Change</u>
ADDITIONS			
Contributions and other income	\$ 110.7	\$ 102.6	7.9 %
Net investment income	324.0	62.7	416.7
Purchase of units (\$1 per unit)	74.9	83.9	(10.7)
Total additions	<u>509.6</u>	<u>249.2</u>	104.5
DEDUCTIONS			
Claims and claims administration	74.6	69.4	7.5
Redemption of units (\$1 per unit)	27.2	27.2	0.0
Administrative expenses	0.7	0.7	0.0
Total deductions	<u>102.5</u>	<u>97.3</u>	5.3
CHANGE IN NET POSITION	<u>\$ 407.1</u>	<u>\$ 151.9</u>	168.0 %

The primary sources of additions to the Trust are contributions and other income, the purchase of units by Montgomery County Public Schools and Montgomery College and net investment income. Contributions and other income comprise employer contributions, rebates from prescription drugs and the Medicare Part D programs. In fiscal year (FY) 2021, contributions and other income increased 7.9 percent to \$110.7 million related with rebates from the prescription drugs and the Medicare Part D programs. The purchase of units by Montgomery County Public Schools and Montgomery College decreased 10.7 percentage to \$74.9 million based on the County Council approved budget resolution for FY 2021. Net investment income increased 416.7 percent to \$324.0 million due to stronger financial markets during the fiscal year.

Deductions from the Trust's net position are primarily comprised of claims and redemption of units by Montgomery County Public Schools. Costs related to claims and claims administration increased 7.5 percent to \$74.6 million due to an increase in claim volume in FY 2021. Redemption of units and administrative expenses remained at the FY 2020 level.

For additional information regarding this report, please contact the Montgomery County Employee Retirement Plans at 240-777-8220.

MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST
STATEMENTS OF FIDUCIARY NET POSITION
AS OF JUNE 30, 2021

	Montgomery County Government and Participating Agencies	Montgomery County Public Schools	Montgomery College	Total Trust
ASSETS				
Equity in pooled cash and investments	\$ 1,464,304	\$ 1,304,873	\$ 161,022	\$ 2,930,199
Investments				
Government and agency obligations	18,663,348	16,699,207	2,060,687	37,423,242
Municipal/Provincial obligations	304,207	272,192	33,589	609,988
Corporate bonds	84,493,550	75,601,398	9,329,233	169,424,181
Common and preferred stock	219,610,237	196,498,323	24,247,946	440,356,506
Mutual and commingled funds	329,617,019	294,927,925	36,394,183	660,939,127
Short-term investments	33,470,018	29,947,612	3,695,543	67,113,173
Cash collateral received under securities lending agreements	5,019,227	4,491,000	554,191	10,064,418
Private real assets	27,967,434	25,024,125	3,087,984	56,079,543
Private equity/debt	101,693,596	90,991,301	11,228,351	203,913,248
Total investments	820,838,636	734,453,083	90,631,707	1,645,923,426
Dividend, interest, and other receivables	1,833,039	1,633,461	201,570	3,668,070
Contributions receivable	7,705,565	-	-	7,705,565
Total assets	831,841,544	737,391,417	90,994,299	1,660,227,260
LIABILITIES				
Payable for collateral received under securities lending agreements	5,019,227	4,491,000	554,191	10,064,418
Accounts payable and other liabilities	3,624,644	3,230,000	398,583	7,253,227
Claims payable	4,375,636	-	-	4,375,636
Total liabilities	13,019,507	7,721,000	952,774	21,693,281
Fiduciary net position held in trust	<u>\$ 818,822,037</u>	<u>\$ 729,670,417</u>	<u>\$ 90,041,525</u>	<u>\$ 1,638,533,979</u>

See accompanying notes to financial statements.

MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST
STATEMENTS OF CHANGES IN FIDUCIARY NET POSITION
FOR THE YEAR ENDED JUNE 30, 2021

	Montgomery County Government and Participating Agencies	Montgomery County Public Schools	Montgomery College	Total Trust
ADDITIONS				
Contributions and other income				
Employer contributions	\$ 93,686,185	\$ -	\$ -	\$ 93,686,185
Federal government - Medicare Part D	16,973,453	-	-	16,973,453
Total contributions and other income	110,659,638	-	-	110,659,638
Investment income	166,040,516	146,780,837	18,054,708	330,876,061
Less investment expenses	3,611,276	3,077,899	378,465	7,067,640
Net gain from investment activities	162,429,240	143,702,938	17,676,243	323,808,421
Income from securities lending	85,546	75,624	9,302	170,472
Less securities lending expenses	(136)	(115)	(14)	(265)
Net income from securities lending	85,682	75,739	9,316	170,737
Purchase of units (\$1 per unit)	-	69,358,879	5,523,000	74,881,879
Total additions	273,174,560	213,137,556	23,208,559	509,520,675
DEDUCTIONS				
Claims and claims administration	74,561,769	-	-	74,561,769
Redemption of units (\$1 per unit)	-	27,200,000	-	27,200,000
Administrative expenses	343,120	292,442	35,959	671,521
Total deductions	74,904,889	27,492,442	35,959	102,433,290
Net increase	198,269,671	185,645,114	23,172,600	407,087,385
Fiduciary net position held in trust				
Beginning of year	620,552,366	544,025,303	66,868,925	1,231,446,594
End of year	\$ 818,822,037	\$ 729,670,417	\$ 90,041,525	\$ 1,638,533,979

See accompanying notes to financial statements.

MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

NOTES TO FINANCIAL STATEMENTS

Year Ended June 30, 2021

INTRODUCTION

During FY 2008, the Montgomery County Council enacted legislation to establish a trust effective July 1, 2007 to fund certain County retiree health benefit plans. Effective July 1, 2011, the Montgomery County Council enacted legislation to change the name to Consolidated Retiree Health Benefits Trust (Trust) due to the addition of County-funded agency retiree health benefits plans for Montgomery County Public Schools and Montgomery College. The purpose of the Trust is to provide funding for retiree health benefits for retirees and their dependents pursuant to Section 115 of the Internal Revenue Code of 1986, as amended.

The Trust is considered part of the County's financial reporting entity and is included in the County's basic financial statements. The accompanying financial statements present only the operations of the Trust in conformity with accounting principles generally accepted in the United States of America (GAAP) applicable to the Trust. They are not intended to present fairly the financial position and results of operations of the entire County. The accompanying notes summarize the significant accounting policies and plan provisions established under the Montgomery County Code.

A. Plan Description and Contribution Information

Plan Membership. As of June 30, 2021, the most recent actuarial valuation, plan membership consisted of the following:

Retirees and beneficiaries receiving benefits	7,441
Active plan members	<u>9,962</u>
Total	<u><u>17,403</u></u>

Plan Administration. Montgomery County Government and the participating agencies and political subdivisions have elected to participate in the Montgomery County Group Insurance Plan (Plan). The Plan is a cost-sharing multiple-employer defined benefit healthcare plan. The benefits available under the Plan are delivered through various providers, each with its own separate rules governing coverage and administration.

Benefits Provided. Substantially all retirees of Montgomery County Government (includes Circuit Court and District Court), Montgomery County Revenue Authority, Housing Opportunities Commission of Montgomery County, Washington Suburban Transit Commission, Strathmore Hall Foundation, Village of Friendship Heights, SkyPoint Federal Credit Union and certain retirees of the State Department of Assessments and Taxation, are provided postemployment benefits such as medical, life, dental, vision, and prescription coverage under the Plan. Retirees may also elect coverage for their eligible dependents. A member of the Employees' Retirement System of Montgomery County, who retires under a normal, early, disability or discontinued service retirement, is eligible for group insurance benefits under the Plan. However, the member is not eligible for group insurance benefits if the member leaves County service prior to retirement eligibility with a deferred vested benefit payable upon the member's future retirement date. A member of the Retirement Savings Plan or the Guaranteed Retirement Income Plan is eligible for group insurance upon separation from service based upon the member's age and credited service at the time of separation. Postemployment benefit provisions and eligibility requirements for retirees are described in the Montgomery County Group Insurance Summary Plan Description.

Plan Contributions. The County Council has the authority to establish and amend contribution requirements of the plan members and the County. The Plan is a contributory plan in which the County and the retired members and beneficiaries contribute, based on an actuarial valuation, certain amounts toward the current cost of healthcare benefits.

During FY 2021, the County and other contributing entities contributed \$93,686,185 for current premiums and claims and prefunding future benefits.

Unit Purchases. This amount represents the County Council's action to fund the retiree health care benefits on behalf of Montgomery County Public Schools \$69,358,879 and \$5,523,000 for Montgomery College during FY 2021.

B. Summary of Significant Accounting Policies

Basis of Accounting. The Trust's financial statements have been prepared under the accrual basis of accounting. Contributions are recognized in the period in which the contributions are required to be made as specified under the County Code. Expenses and claims are recognized when due in accordance with the terms of the Plan.

Method Used to Value Investments. Investments are stated at fair value. The fair value for public securities is generally based on quoted market prices at June 30, 2021. Fair value for private investment funds, including private equity and private real assets, is determined using net asset values supplied by the fund managers, which are based upon the fund managers' valuations of the funds' underlying holdings. Such values involve subjective judgment and may differ from amounts which would be realized if such holdings were actually sold. The fair value of limited partnership investments are based on valuations of the underlying assets of the limited partnerships as reported by the general partner. Cash received as collateral on securities lending transactions and investments made with such cash are reported at fair value along with a related liability for collateral received.

Equity in County's Pooled Cash and Investments. The Trust maintains its short-term cash with the County, which invests cash and allocates interest earned, on a quarterly basis to the Trust based on the Trust's average daily balance of its equity in pooled cash. The County's policy is to fully collateralize the cash maintained in the pool.

Accounting Changes. There were no new pronouncements adopted during the year ended June 30, 2021.

C. Net OPEB Liability

The components of the Plan's net OPEB liability as of June 30, 2021, were as follows:

Total OPEB Liability (a)	Plan Fiduciary Net Position (b)	Net OPEB Liability (a-b)	Plan Fiduciary Net Position as a % of Total OPEB Liability (b/a)
\$1,661,544,310	\$818,822,037	\$842,722,273	49.28%

Actuarial assumptions. The total OPEB liability was determined by an actuarial valuation as of July 1, 2021, using the following actuarial assumptions, applied to all periods included in the measurement, unless otherwise specified:

Valuation Date	July 1, 2021
Measurement Date	June 30, 2021
Actuarial cost method	Entry Age Normal
Discount Rate	5.28%
20 Yr. Municipal Bond Rate	1.92%
Municipal Bond Rate Basis	20-year tax exempt general obligation municipal bond with average rating of AA/Aa
Expected Return on Assets	7.50%
Salary Increases	4.25% to 8.25%
General Inflation	3.00%

Mortality	
Healthy Retirees	Group A, H, J, GRIP – Pub-2010 Healthy Mortality, Headcount weighted, General Employees, Sex Distinct, Fully Generational projected from 2010 using scale MP-2018 Group E, F, G – Pub-2010 Healthy Mortality, Headcount weighted, Public Safety Employees, Sex Distinct, Fully Generational projected from 2010 using scale MP-2018
Disabled Retirees	Group A, H, J, GRIP – Pub-2010 Disabled Mortality, Headcount weighted, General Employees, Sex Distinct, Fully Generational projected from 2010 using scale MP-2018 Group E, F, G – Pub-2010 Disabled Mortality, Headcount weighted, Public Safety Employees, Sex Distinct, Fully Generational projected from 2010 using scale MP-2018
Health care cost trend rates	The medical trend assumption was developed using the Society of Actuaries (SOA) Long-Run Medical Cost Trend Model, version 2019_b. The initial rate is 5.40% and the ultimate rate is 3.68%.

The actuarial assumptions used in the June 30, 2021 valuation, with the exception of the mortality assumptions, were based on the results of an actuarial experience study conducted by the County in September 2019 for the period July 1, 2014 to July 1, 2018 for the Montgomery County Employees' Retirement System.

The long-term expected rate of return on OPEB plan investments was determined using a building-block method in which best-estimate ranges of expected future real rates of return (expected returns, net of OPEB plan investment expense and inflation) are developed for each major asset class. These ranges are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation. Best estimates of geometric real rates of return for each major asset class included in the OPEB plan's target asset allocation as of June 30, 2021 are summarized in the following table:

Asset Class	Long-Term Expected Real Rate of Return
Domestic Equities	3.40 %
International Equities	3.90
Emerging Market Equities	5.50
Global Equities	4.20
Private Equity	6.60
Credit Opportunities	4.10
High Yield Bonds	0.90
Emerging Market Debt	1.00
Directional Hedge Funds	2.00
Long Duration Fixed Income	(0.80)
Cash	(1.20)
Diversifying Hedge Funds	2.00
Global ILs	1.90
Private Real Assets	4.90
Public Real Assets	3.90

Discount Rate. A single discount rate of 5.28% was used to measure the total OPEB liability as of June 30, 2021. This single discount rate was blended based on the expected long-term rate of return on OPEB plan investments of 7.5% and the municipal long term high quality bond index yield (at the measurement date) of 1.92% as described under the terms of the GASB standard. The projection of cash flows used to determine the single discount rate assumes that employer contributions will be made based on the current funding policy (contributions equal to the employer normal cost plus a 30-year open level percent of pay amortization of the unfunded employer liability). Based on these assumptions, the OPEB plan's fiduciary net position was projected to not be sufficient to make all projected future benefit payments on behalf of current plan members. Therefore, the long-term expected rate of return on plan investments was applied only to those payments prior to the depletion of the fiduciary net position and the bond yield index rate was applied to those benefit payments subsequent to the projected depletion of the fiduciary net position.

Sensitivity of the Net OPEB Liability to Changes in the Discount Rate. The following presents the net OPEB liability calculated using the discount rate of 5.28%, as well as what the net OPEB liability would be if it were calculated using a discount rate that is 1-percentage-point lower (4.28%) or 1-percentage-point higher (6.28%) than the current rate:

	1% Decrease	Discount Rate	1% Increase
	<u>4.28%</u>	<u>5.28%</u>	<u>6.28%</u>
Net OPEB Liability	\$1,067,743,706	\$842,722,273	\$658,001,946

Sensitivity of the Net OPEB Liability to Changes in the Healthcare Cost Trend Rate. The following presents the net OPEB liability of the Plan using the healthcare cost trend rate of 3.68%, as well as what the Plan's net OPEB liability would be if it were calculated using healthcare cost trend rates that are 1-percentage-point lower (2.68%) or 1-percentage-point higher (4.68%) than the current healthcare cost trend rate:

	1% Decrease	Trend Rate	1% Increase
	<u>2.68%</u>	<u>3.68%</u>	<u>4.68%</u>
Net OPEB Liability	\$645,804,992	\$842,722,273	\$1,088,288,866

D. Trustees of the Plan

The County established a Board of Trustees (Board) for the Trust to be responsible for the investment management of the Trust's assets for the exclusive benefit of the members. The Board consists of nineteen members appointed by the County Executive and confirmed by the County Council.

E. Investments

Section 33-163 of the Code authorizes the Board to act with the care, skill, prudence and diligence under the circumstances that a prudent person acting in a similar capacity and familiar with the same matters would use to conduct a similar enterprise with similar purposes. The Code also requires that such investments be diversified so as to minimize the risk of large losses unless it is clearly not prudent to diversify under the circumstances. The Board has adopted an investment policy that works to control the extent of downside risk to which the Trust is exposed while maximizing the potential for long term increases in the value of assets. The overall investment policies do not address specific levels of credit risk, interest rate risk or foreign currency risk. The Board believes that risks can be managed, but not eliminated, by establishing constraints on the investment portfolios and by monitoring the financial markets, the Trust's asset allocation and the investment managers hired by the Trust. Each investment manager has a specific benchmark and investment guidelines appropriate for the type of investments they are managing.

The table on the next page shows the Board's adopted asset allocation policy as of June 30, 2021:

Asset Class	Target Allocation	
Domestic Equities	16.80	%
International Equities	13.50	
Emerging Market Equities	3.90	
Global Equities	3.80	
Private Equity	8.00	
Credit Opportunities	2.00	
High Yield Bonds	7.50	
Emerging Markets Debt	2.50	
Directional Hedge Funds	2.50	
Total Growth	60.50	
Long Duration Fixed Income	12.50	
Cash	1.00	
Diversifying Hedge Funds	2.50	
Total Risk Mitigation	16.00	
Global ILs	13.50	
Private Real Assets	5.00	
Public Real Assets	5.00	
Total Real Assets/Inflation Protection	23.50	
Total	100.00	%

Rate of Return. The annual money-weighted rate of return on the Trust investments, net of investment expenses, for FY 2021 was 26.09%. The money-weighted rate of return expresses investment performance, net of investment expense, adjusted for the changing amounts actually invested.

Fair Value Measurement. The Trust categorizes its fair value measurements within the fair value hierarchy established by generally accepted accounting principles. The hierarchy is based on the valuation inputs used to measure the fair value of the asset and gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (level I measurements) and the lowest priority to unobservable inputs (level III measurements).

Level I – Unadjusted quoted prices for identical assets or liabilities in active markets.

Level II – Quoted prices for similar assets or liabilities in active markets; quoted prices for identical or similar assets or liabilities in markets are not active; and model-derived valuations in which all significant inputs are observable.

Level III – Valuations derived from valuation techniques in which significant inputs are unobservable.

Investments that are measured at fair value using the net asset value per share (or its equivalent) as a practical expedient are not classified in the fair value hierarchy. In instances where inputs used to measure fair value fall into different levels in the fair value hierarchy, fair value measurements in their entirety are categorized based on the lowest level input that is significant to the valuation. The Trust's assessment of the significance of particular inputs to these fair value measurements requires judgment and considers factors specific to each asset or liability.

The table below shows the fair value leveling of the Trust's investments:

	6/30/2021	Fair Value Measurements Using		
		Quoted Prices in Active Markets for Identical Assets	Significant Other Observable Inputs	Significant Unobservable Inputs
		Level I	Level II	Level III
Investments by fair value level				
Debt securities				
Government and agency obligations	\$ 37,423,242	\$ -	\$ 37,423,242	\$ -
Municipal/Provincial obligations	609,988	-	609,988	-
Corporate bonds	169,424,181	-	169,053,663	370,518
Total debt securities	207,457,411	-	207,086,893	370,518
Equity securities				
Consumer goods	68,555,745	68,555,745	-	-
Communication Services	28,947,035	28,308,010	639,025	-
Energy	15,298,199	15,224,548	73,651	-
Financials	40,053,965	40,053,965	-	-
Health Care	52,034,288	52,034,288	-	-
Industrials	55,169,193	54,809,448	359,745	-
Information Technology	84,837,348	84,837,348	-	-
Materials	12,838,767	12,695,196	141,246	2,325
Real Estate	64,207,901	64,207,901	-	-
Utilities	18,414,064	18,305,879	19,124	89,061
Total equity securities	440,356,505	439,032,328	1,232,791	91,386
Securities lending collateral fund	10,064,418	-	10,064,418	-
Total investments by fair value level	657,878,334	\$ 439,032,328	\$ 218,384,102	\$ 461,904
Investments measured at the net asset value (NAV)				
Commingled equity funds	255,600,305			
Commingled bond funds	281,470,785			
Commingled real asset funds	-			
Hedge fund	58,905,155			
Fund-of-hedge funds	64,962,883			
Private real assets	56,079,543			
Private equity/debt	203,913,248			
Total investments measured at the NAV	920,931,919			
Investments measured at amortized cost				
Short-term investments	67,113,173			
Total investments measured at amortized cost	67,113,173			
Total investments	\$ 1,645,923,426			
Investment derivative instruments:				
Foreign exchange contracts	\$ 248,420	\$ -	\$ 248,420	
Credit Default Swaps	\$ 722,425	\$ -	\$ 722,425	

Equity securities classified in Level I are valued using prices quoted in active markets for those securities.

Debt securities classified in Level II and Level III are valued using either a bid evaluation, or matrix pricing technique. Bid evaluations may include market quotations, yields, maturities, call features and ratings. Matrix pricing is used to value securities based on the securities relationship to benchmark quoted prices. Level II debt securities have non-proprietary information that was readily available to market participants, from multiple independent sources, which are known to be actively involved in the market. Level III debt securities use proprietary information or single source pricing. Equity securities classified in Level II are securities whose values are derived daily from associated traded securities. Short-term investments are cash or cash equivalents and generally include investments in money market-type securities reported at cost plus accrued interest, which approximates market or fair value.

The valuation method for investments measured at the net asset value (NAV) per share, or equivalent, is presented in the table below:

Investments Measured at the NAV

	Fair Value	Unfunded Commitments	Redemption Frequency	Redemption Notice Period
Commingled equity funds	\$ 255,600,305	\$ -	Daily, Weekly, Monthly	0-15 days
Commingled bond funds	281,470,785	-	Daily, Monthly	0-5 days
Hedge fund	58,905,155	-	Monthly	5 days
Fund-of-hedge funds	64,962,883	-	Quarterly	95 days
Private real assets	56,079,543	11,782,951	Not eligible	N/A
Private equity/debt	203,913,248	33,927,422	Not eligible	N/A
Total investments measured at the NAV	<u>\$ 920,931,919</u>	<u>\$ 45,710,372</u>		

Commingled Bond Funds and Equity Funds. Six bond fund and nine equity funds are considered to be commingled in nature. The fair value of the investments in these types of funds have been determined using the NAV per share of the investments.

Hedge Fund. One fund is categorized in this category. The fair value of the investments has been determined using the NAV per share of the fund.

Fund-of-Hedge Funds. The fair value of these funds are based upon information provided by underlying hedge fund investments using the NAV per share of the funds. Fund-of-hedge funds provide additional opportunities in terms of manager access, investment structuring, and fees. These funds also could be subject to varying degrees of redemption restrictions based on market conditions that may impact their underlying portfolios.

Private Real Assets. The portfolio consists of thirty-three private real asset limited partnerships. Private real asset funds include U.S. real estate, oil and gas, timber, agriculture and other real asset investments. The fair value of these funds has been determined using the net asset values as of June 30, 2021. Net asset values one quarter in arrears plus current quarter cash flows are used when the most recent information is not available. These funds are not eligible for redemption. Distributions are received as underlying investments within the funds are liquidated, which on average can occur over a span of 5 to 10 years.

Private Equity/Debt. The portfolio consists of sixty-one private equity/debt limited partnerships. Private equity funds include buyout, turnaround, and fund-of-funds investments. Private debt funds include distressed and structured equity investments. The fair value of these funds has been determined using the net asset values as of June 30, 2021. Net asset values one quarter in arrears plus current quarter cash flows are used when the most recent information is not available. These funds are not eligible for redemption. Distributions are received as underlying investments within the funds are liquidated, which on average can occur over a span of 3 to 10 years.

Interest Rate Risk. Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of the investment. The Board's investment policies and guidelines manage interest rate risk by establishing duration constraints on each fixed income manager's portfolio based on the duration of each manager's respective benchmark. Duration is a measure of interest rate risk based on a bond price's sensitivity to a 100-basis point change in interest rates. The greater the duration of a bond, or a portfolio of bonds, the greater its price volatility will be in response to a change in interest rates and vice-versa. Duration of eight would mean that, given a 100-basis point change up/down in rates, a bond's price would move down/up by 8 percent.

As of June 30, 2021, the Trust's fixed income portfolio had the following sensitivity to changes in interest rates as shown below:

Type of Investment	Effective Duration in Years	Fair Value	Percentage of Portfolio
U.S. Government Obligations	18.71	\$ 36,591,325	6.58 %
Foreign Government Obligations	1.75	831,917	0.14
Municipal/Provincial Obligations	15.62	609,988	0.11
Corporate Bonds	6.65	169,424,181	30.47
Fixed Income Pooled Funds	N/A	281,470,785	50.62
Short-term Investments and Others *	N/A	67,113,173	12.08
Total Fixed Income Securities		<u>\$ 556,041,369</u>	<u>100.00 %</u>

*Short-term investments consist of U.S. Treasury and government sponsored securities, money market funds, commercial paper, certificates of deposit, repurchase agreements, asset backed securities, notes and bonds issued by U.S. corporations, and other allowable instruments that meet short-term maturity or average life, diversification, and credit quality restrictions.

Credit Risk/Concentration of Credit Risk. Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. The Board's investment policies and guidelines limit the percentage of the total fund and individual manager's account which can be invested in fixed income securities rated below investment grade. In addition, the Board's investment policies and guidelines, for the majority of public fund managers, limit the percentage of each investment manager's account that may be allocated to any one security, position, issuer or affiliated issuer, to less than 5 percent of the fair value of the investment manager's account. The Trust does not have investments (other than those issued or explicitly guaranteed by the U.S. Government, pooled investments or short-term investments) in any one company that represents 5 percent or more of net assets.

The quality ratings of investments in fixed income securities as described by nationally recognized rating organizations as of June 30, 2021 are as follows:

Type of Investment	Quality Rating	Fair Value	Percentage of Portfolio
U.S. Government Obligations*	AA	\$ 36,591,325	6.58 %
Foreign Government Obligations	AA	637,000	0.11
	BBB	169,667	0.03
	BB	25,250	0.00
Municipal/Provincial Bonds	AA	609,988	0.11
Corporate Bonds	AA	3,935,123	0.71
	A	14,192,338	2.55
	BBB	32,430,328	5.83
	BB	50,004,735	8.99
	B	45,630,969	8.21
	CCC	17,736,585	3.19
	CC	75,000	0.01
	C	32,040	0.01
	D	147,740	0.03
	Unrated	5,239,323	0.94
Fixed Income Pooled Funds	Unrated	281,470,785	50.62
Short-term Investments and others	Unrated	67,113,173	12.08
Total Fixed Income Securities		<u>\$ 556,041,369</u>	<u>100.00 %</u>

*Obligations of the U.S. government or obligations explicitly guaranteed by the U.S. government are not considered to have credit risk and do not have purchase limitations.

Foreign Currency Risk. Foreign currency risk is the risk that changes in exchange rates will adversely affect the fair value of an investment. The Board's International Investing Policy's objective is to achieve long-term capital appreciation and current income by investing in diversified portfolios of non-U.S. equities and bonds. The Trust has indirect exposure to foreign currency risk as shown in the table below:

International Securities	Equity	Fixed Income	Short-Term and Other	Total Non-U.S. Dollar
Euro	\$ 39,964,388	\$ -	\$ (11,346,442)	\$ 28,617,946
Swedish krona	7,449,497	-	15,560,231	23,009,728
Canadian dollar	7,452,702	-	5,869,145	13,321,847
Hong Kong dollar	14,794,419	-	(2,223,956)	12,570,463
Norwegian krone	255,924	-	8,976,267	9,232,191
British pound sterling	18,517,796	-	(11,430,613)	7,087,183
Russian ruble	-	-	4,822,685	4,822,685
Indonesian rupiah	-	-	4,410,363	4,410,363
Singapore dollar	2,694,037	-	865,923	3,559,960
Indian rupee	-	-	3,291,971	3,291,971
Other Currencies	38,818,320	-	(75,472,744)	(36,654,424)
Total International Securities	\$ 129,947,083	\$ -	\$ (56,677,170)	\$ 73,269,913

Derivatives. In accordance with the Board's Statement of Investment Policy and Objectives, the Trust regularly invests in derivative financial instruments in the normal course of its investing activities to manage exposure to certain risks within the fund. During FY 2021, the Trust invested directly in various derivatives including exchange-traded futures contracts, forward currency contracts, and swaps. Investment managers are prohibited from purchasing securities on margin or using leverage unless specifically permitted within the investment manager's guidelines. These investments generally contain market risk resulting from fluctuations in interest and currency rates. The credit risk of these investments is associated with the creditworthiness of the related parties to the contracts. The Trust could be exposed to risk if the counterparties to the contracts are unable to meet the terms of the contracts. The Board's Statement of Investment Policy and Objectives seeks to control this risk through counterparty credit evaluations and approvals, counterparty credit limits, and exposure monitoring procedures. In addition, the Trust has indirect exposure to market and credit risk through its ownership interests in certain mutual and commingled funds which may hold derivative financial instruments. The Trust is not a dealer, but an end-user of these instruments.

The notional or contractual amounts of derivatives indicate the extent of the Trust's involvement in the various types of derivative financial instruments and do not measure the Trust's exposure to credit or market risk and do not necessarily represent amounts exchanged by the parties. The amounts exchanged are determined by reference to the notional amounts and the other terms of the derivatives.

As permitted by the Board's policies, the Trust holds off-financial statement derivatives in the form of exchange-traded financial futures.

Futures contracts are contracts in which the buyer agrees to purchase and the seller agrees to make delivery of a specified financial instrument at a predetermined date and price. Gains and losses on futures contracts are settled daily. Futures contracts are standardized and are traded on exchanges. The exchange assumes the risk that a counterparty will not pay. As of June 30, 2021, the Trust held 62 long US Treasury futures contracts with a fair value of \$11,030,125. The Trust also held 10 currency futures contracts with a fair value of \$806,200 and 314 equity futures contracts with fair value of \$40,044,621.

Foreign exchange contracts involve an agreement to exchange the currency of one country for the currency of another country at an agreed-upon price and settlement date. Foreign exchange contracts contain market risk resulting from fluctuations in currency rates. The credit risk is associated with the creditworthiness of the related parties to the contracts. As of June 30, 2021, the Trust held \$278,655,284 buy foreign exchange contracts and (\$278,406,864) sell foreign exchange contracts. The unrealized gain on the Trust's contracts was \$248,420.

Credit default swaps are credit derivative contracts that enable investors to transfer credit risk of fixed income securities with another counterparty. As of June 30, 2021, the Trust held one credit default swap sell contract with a fair value of \$722,425 and notional amount of \$7,012,000.

Securities Lending. Board policy permits the Trust to lend its securities to broker-dealers and other entities (borrowers) for collateral that will be returned for the same securities in the future. The Trust's custodian is the agent in lending the Trust's securities for collateral of 102 percent for domestic and 105 percent for international securities. The custodian receives cash, securities or irrevocable bank letters of credit as collateral. All securities loans can be terminated on demand by either the Trust or the borrower. Cash collateral received from the borrower is invested by the lending agent, as an agent for the Trust, in a short-term investment pool in the name of the Trust, with guidelines approved by the Board. Such investments are considered a collateralized investment pool. The relationship between the maturities of the investment pool and the Trust's loans are affected by the maturities of securities loans made by other plan entities that invest cash collateral in the investment pool, which the Trust cannot determine. The Trust records a liability for the return of the cash collateral shown as collateral held for securities lending in the statement of fiduciary net position. The agent indemnifies the Trust by agreeing to purchase replacement securities, or return the cash collateral thereof, in the event a borrower fails to return loaned securities or pay distributions thereon. There were no such failures by any borrower during the FY, nor were there any losses during the period resulting from a default of the borrower or lending agent.

As of June 30, 2021, the fair value of securities on loan was \$87,712,535. Cash received as collateral and the related liability of \$10,064,418 as of June 30, 2021, is shown on the Statement of Fiduciary Net Position. Securities received as collateral are not reported as assets since the Trust does not have the ability to pledge or sell the collateral securities absent borrower default. Securities lending revenues and expenses amounting to \$170,472 and (\$265) respectively, have been classified with investment income and investment expenses, respectively, in the accompanying financial statements.

The following represents the balances relating to the securities lending transactions at June 31, 2021:

Securities Lent	Underlying Securities	Non-Cash Collateral Value	Cash Collateral Investment Value
Lent for Cash Collateral:			
Government Obligations	\$ -	\$ -	\$ -
Corporate Bonds	6,649,871	-	6,843,056
Equities	3,123,972	-	3,221,362
Lent for Non-Cash Collateral:			
Government Obligations	32,163,683	33,681,728	-
Corporate Bonds	805,513	831,903	-
Equities	44,969,496	45,998,560	-
Total	<u>\$ 87,712,535</u>	<u>\$ 80,512,191</u>	<u>\$ 10,064,418</u>

At year-end, the Trust has no credit risk exposure to borrowers because the amounts the Trust owes the borrowers exceeded the amounts the borrowers owe the Trust. The Trust is fully indemnified by its custodial bank against any losses incurred as a result of borrower default.

Custodial Credit Risk. Custodial credit risk is the risk that, in the event of the failure of the counterparty, the Trust will not be able to recover the value of its investments or collateral securities that are in the possession of an outside party. As of June 30, 2021, there were no funds held by a counterparty that was acting as the Trust's agent in securities lending transactions.

REQUIRED SUPPLEMENTARY INFORMATION

The following required supplementary information is intended to help users assess the Trust's net position as a percentage of total OPEB liability, assess progress made in accumulating assets to pay benefits when due, and make comparisons among employers.

SCHEDULE OF CHANGES IN THE NET OPEB LIABILITY AND RELATED RATIOS

Fiscal Year Ending	June 30, 2021	June 30, 2020	June 30, 2019	June 30, 2018	June 30, 2017
Total OPEB Liability					
Service Cost	\$ 56,485,667	\$ 50,603,665	\$ 70,518,206	\$ 65,155,686	\$ 73,126,875
Interest Cost	90,817,670	84,115,630	111,580,719	117,685,710	116,270,504
Changes in Benefit Terms	(21,037,342)	-	-	-	-
Differences between Expected and Actual Experiences	(117,357,835)	76,398,324	(351,021,508)	(1,877,264)	(22,113,781)
Changes of Assumptions	78,158,490	69,533,390	(191,917,617)	(268,604,422)	(261,363,550)
Medicare Part D Reimbursement	16,973,453	13,625,461	11,094,679	10,453,719	6,345,721
Benefit Payments	(74,561,769)	(69,398,524)	(66,208,939)	(60,773,387)	(63,284,352)
Net Change in Total OPEB Liability	29,478,334	224,877,946	(415,954,460)	(137,959,958)	(151,018,583)
Total OPEB Liability – Beginning	1,632,065,976	1,407,188,030	1,823,142,490	1,961,102,448	2,112,121,031
Total OPEB Liability – Ending (a)	<u>\$ 1,661,544,310</u>	<u>\$ 1,632,065,976</u>	<u>\$ 1,407,188,030</u>	<u>\$ 1,823,142,490</u>	<u>\$ 1,961,102,448</u>
Plan Fiduciary Net Position					
Contributions – Employer	\$ 93,686,185	\$ 88,939,381	\$ 77,208,188	\$ 63,725,810	\$ 122,466,187
Net Investment Income	162,514,922	33,971,605	39,922,676	40,066,004	42,759,085
Medicare Part D Reimbursement	16,973,453	13,625,461	11,094,679	10,453,719	6,345,721
Benefit Payments	(74,561,769)	(69,398,524)	(66,208,939)	(60,773,387)	(63,284,352)
Administrative Expense	(343,120)	(341,413)	(339,355)	(276,553)	(4,292,538)
Net Change in Plan Fiduciary Net Position	198,269,671	66,796,510	61,677,249	53,195,593	103,994,103
Plan Fiduciary Net Position – Beginning	620,552,366	553,755,856	492,078,607	438,883,014	334,888,911
Plan Fiduciary Net Position – Ending (b)	<u>\$ 818,822,037</u>	<u>\$ 620,552,366</u>	<u>\$ 553,755,856</u>	<u>\$ 492,078,607</u>	<u>\$ 438,883,014</u>
Net OPEB Liability – Ending (a-b)	\$ 842,722,273	\$ 1,011,513,610	\$ 853,432,174	\$ 1,331,063,883	\$ 1,522,219,434
Plan Fiduciary Net Position as a Percentage of Total OPEB Liability	<u>49.28%</u>	<u>38.02%</u>	<u>39.35%</u>	<u>26.99%</u>	<u>22.38%</u>
Covered Payroll	\$ 817,394,000	\$ 803,597,000	\$ 785,379,904	\$ 766,111,522	\$ 750,986,381
Net OPEB Liability as a Percentage of Covered Payroll	<u>103.10%</u>	<u>125.87%</u>	<u>108.66%</u>	<u>173.74%</u>	<u>202.70%</u>
Expected Average Remaining Service Years of All Participants					

Notes to Schedule:

Benefit changes:

The subsidy schedule for participants hired after June 30, 2011 ranges from 50% after 10 years of service to 70% at 25 years of service.

Changes of assumptions:

The discount rate was changed as follows ==>	5.28%	5.68%	6.10%	6.26%	5.88%
The December 2019 Federal appropriations bill eliminated the excise tax on high-cost plans that was part of the Affordable Care Act (commonly referred to as the "Cadillac Tax"). Accordingly, the Cadillac Tax is removed from the trend assumption.					
The subsidy percentage for 527 retirees that had been unintentionally misreported on the valuation data file used to calculate the liabilities for the FY 2019 GASB 74 and FY 2020 GASB 75 disclosures					

Note: Schedule is intended to show information for 10 years. Additional years will be displayed as they become available.

SCHEDULE OF EMPLOYER CONTRIBUTIONS

FY Ended June 30	Actuarially Determined Contribution	Actual Contribution	Contribution Deficiency (Excess)	Covered Payroll	Actual Contribution as a % of Covered Payroll
2017	\$ 112,702,000	\$ 122,466,187	\$ (9,764,187)	\$750,986,381	16.31%
2018	117,474,000	63,725,810	53,748,190	766,111,522	8.32
2019	116,737,000	77,208,188	39,528,812	785,379,904	9.83
2020	72,150,000	88,939,381	(16,789,381)	803,597,000	11.07
2021	75,979,000	93,686,185	(17,707,185)	817,384,000	11.46

Note: Schedule is intended to show information for 10 years. Additional years will be displayed as they become available.

NOTES TO SCHEDULE OF EMPLOYER CONTRIBUTIONS

<i>Benefit changes</i>	The subsidy schedule for participants hired after June 30, 2011 ranges from 50% after 10 years of service to 70% at 25 years of service.												
<i>Changes of assumptions</i>	None												
<i>Methods and assumptions used to determine contribution rates:</i>													
Valuation Date	7/1/2021												
Actuarial cost method	Projected Unit Credit												
Amortization method	Level percent of payroll												
Remaining amortization period	30 Year open												
Asset valuation method	Market value of assets												
Investment rate of return	7.50%												
Payroll growth rate	Vary based on participant group and service. Increases start between 7.25% and 11.25% at hire and decrease to 3.25% after 20 years of service.												
Inflation	3.00%												
Mortality	For healthy retirees and beneficiaries - PUB-2010 Healthy Mortality, Headcount weighted Sex Distinct, Fully Generational projected from 2010 using scale MP-2018. Public safety employees are assumed to use the public safety version of the mortality table and the rest of the employees are assumed to use the general employees version of the mortality table. For disabled retirees - PUB-2010 Disabled Mortality, Headcount weighted Sex Distinct, Fully Generational projected from 2010 using scale MP-2018. Public safety employees are assumed to use the public safety version of the mortality table and the rest of the employees are assumed to use the general employees version of the mortality table.												
Healthcare cost trend rate	The medical trend assumption was developed using the Society of Actuaries (SOA) Long-Run Medical Cost Trend Model, version 2019_b. The SOA model is flexible and allows for adjustments that ultimately control how quickly the current trend converges to the percentage increase in the GDP. Montgomery County has selected the following assumptions were used as input variables into the SOA model: <table> <tr> <td>Rate of Inflation</td><td>2.40%</td></tr> <tr> <td>Rate of Growth in Real Income / GDP per Capita</td><td>1.25%</td></tr> <tr> <td>Excess Medical Growth</td><td>1.20%</td></tr> <tr> <td>Expected Health Share of DCP in 2028</td><td>20.50%</td></tr> <tr> <td>Health Share of GDP Resistance Point</td><td>15.00%</td></tr> <tr> <td>Year for Limiting Cost Growth to GDP Growth</td><td>2040</td></tr> </table> <p>The initial trend rate is 5.40% in 2020 and decreases until reaching the ultimate rate of 3.68% in 2040. The dental trend is set to 4.50% per year.</p>	Rate of Inflation	2.40%	Rate of Growth in Real Income / GDP per Capita	1.25%	Excess Medical Growth	1.20%	Expected Health Share of DCP in 2028	20.50%	Health Share of GDP Resistance Point	15.00%	Year for Limiting Cost Growth to GDP Growth	2040
Rate of Inflation	2.40%												
Rate of Growth in Real Income / GDP per Capita	1.25%												
Excess Medical Growth	1.20%												
Expected Health Share of DCP in 2028	20.50%												
Health Share of GDP Resistance Point	15.00%												
Year for Limiting Cost Growth to GDP Growth	2040												

SCHEDULE OF INVESTMENT RETURNS

FY Ending June 30	2021	2020	2019	2018	2017
Annual money weighted rate of return, net of investment expense	26.09%	4.69%	8.26%	8.82%	11.99%

Note: Schedule is intended to show information for 10 years. Additional years will be displayed as they become available.



SB & COMPANY, LLC
KNOWLEDGE • QUALITY • CLIENT SERVICE

**REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS ON INTERNAL CONTROLS
OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE
WITH *GOVERNMENT AUDITING STANDARDS***

The Honorable County Council of Montgomery County, Maryland
Board of Trustees
Montgomery County Consolidated Retiree Health Benefits Trust

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Montgomery County Consolidated Retiree Health Benefits Trust (the Trust), as of and for the year ended June 30, 2021, and the related notes to the financial statements, and have issued our report thereon dated September 30, 2021.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Trust's internal controls over financial reporting (internal controls) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Trust's internal controls. Accordingly, we do not express an opinion on the effectiveness of the Trust's internal controls.

A *deficiency in internal controls* exists when the design or operation of a control does not allow management or employees in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal controls, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal controls that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal controls was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal controls that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal controls that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Trust's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal controls and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal controls or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal controls and compliance. Accordingly, this communication is not suitable for any other purpose.

Owings Mills, Maryland
September 30, 2021

SB + Company, LLC