MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

FINANCIAL STATEMENTS AND SUPPLEMENTARY INFORMATION YEAR ENDED JUNE 30, 2022

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 Audit of the Financial Statements

Opinion

We have audited the accompanying statement of fiduciary net position of Montgomery County Consolidated Retiree Health Benefits Trust (the Trust) as of June 30, 2022, and the related statement 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.

In our opinion, the accompanying financial statements present fairly, in all material respects, fiduciary net position of the Trust as of June 30, 2022, and the respective changes in its fiduciary position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Trust and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

The Trust's management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for 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.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Trust's ability to continue as a going concern for one year beyond the date the financial statements are available to be issued, including any currently known information that may raise substantial doubt shortly thereafter.



Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal controls relevant to the audit 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 Trust's internal controls. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Trust's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal controls—related matters that we identified during the audit.

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 is the responsibility of management and, 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 29, 2022 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.

SB + Company, If C

Owings Mills, Maryland September 29, 2022

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, 2022.

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:

	1	Net Position (Millions)		
AGOPTO		2022	2021	Percentage Change
ASSETS Cash and investments Receivables Total assets	\$	1,562.9 8.6 1,571.5	\$ 1,648.8 11.4 1,660.2	(5.2) % (24.6) (5.3)
LIABILITIES Claims payable Other liabilities Total liabilities		4.7 33.5 38.2	4.4 17.3 21.7	6.8 93.4 75.9
NET POSITION	\$	1,533.3	\$ 1,638.5	(6.4) %

Net position held in the Trust as of June 30, 2022 decreased 6.4 percent to \$1,533.3 million primarily due to contributions made to the Trust and investment losses during the fiscal year. Receivables decreased 24.6 percent to \$8.6 million related to rebates from prescription drugs and the Medicare Part D programs. Other liabilities increased 93.4 percent to \$33.5 million mainly related to increases in cash collateral on securities 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)					
		2022		2021	Percentage Change
ADDITIONS					
Contributions and other income	\$	87.3	\$	110.7	(21.1) %
Investment (loss) income		(160.9)		324.0	(149.7)
Purchase of units (\$1 per unit)		78.7		74.9	5.1
Total additions		5.1		509.6	(99.0)
DEDUCTIONS					
Claims and claims administration		82.4		74.6	10.5
Redemption of units (\$1 per unit)		27.2		27.2	-
Administrative expenses		0.7		0.7	-
Total deductions		110.3		102.5	7.6
CHANGE IN NET POSITION	\$	(105.2)	\$	407.1	(125.8) %

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 (loss) income. Contributions and other income comprise employer contributions, rebates from prescription drugs and the Medicare Part D programs. In fiscal year (FY) 2022, contributions and other income decreased 21.1 percent to \$87.3 million mainly related to decreases in contributions towards claims. The purchase of units by Montgomery County Public Schools and Montgomery College increased 5.1 percentage to \$78.7 million based on the County Council approved budget resolution for FY 2022. Net investment income decreased 149.7 percent to loss of \$160.9 million due to weaker 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 10.5 percent to \$82.4 million due to an increase in claim volume in FY 2022. Redemption of units and administrative expenses remained at the FY 2021 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, 2022

	Go	tgomery County overnment and cipating Agencies		ontgomery County blic Schools		ntgomery College		Total Trust
ASSETS								
Equity in pooled cash and investments	\$	516,045	\$	487,661	\$	60,144	\$	1,063,850
Investments								
Government and agency obligations		18,341,261		17,332,423	2	2,137,651		37,811,335
Municipal/Provincial obligations		1,475,384		1,394,232		171,954		3,041,570
Corporate bonds		74,243,901	,	70,160,208	8	3,653,032		153,057,141
Commercial mortgage-backed securities		384,396		363,253		44,801		792,450
Common and preferred stock		168,435,589	1:	59,171,002	19	9,630,954		347,237,545
Mutual and commingled funds		307,208,644	2	90,311,023	35	5,804,775		633,324,442
Short-term investments		38,035,686		35,943,581	4	4,433,011		78,412,278
Cash collateral received under								
securities lending agreements		9,657,444		9,126,248	1	1,125,563		19,909,255
Private real assets		33,317,348		31,484,769		3,883,095		68,685,212
Private equity/debt		106,507,188	1	00,648,894	12	2,413,277		219,569,359
Total investments		757,606,841	7	15,935,633	88	8,298,113	1	,561,840,587
Dividend, interest, and other receivables		1,922,342		1,816,605		224,046		3,962,993
Contributions receivable		4,652,159		<u>-</u>				4,652,159
Total assets		764,697,387	7	18,239,899	88	8,582,303	1	,571,519,589
LIABILITIES								
Payable for collateral received under								
securities lending agreements		9,657,444		9,126,248	1	1,125,563		19,909,255
Accounts payable and other liabilities		6,595,083		6,232,330		768,649		13,596,062
Claims payable		4,652,159		<u> </u>		<u> </u>		4,652,159
Total liabilities		20,904,686		15,358,578	1	1,894,212		38,157,476
Fiduciary net position held in trust	\$	743,792,701	\$ 7	02,881,321	\$86	6,688,091	\$ 1	,533,362,113

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, 2022

	G	ntgomery County overnment and cipating Agencies	Montgomery County Public Schools	Montgomery College	Total Trust
ADDITIONS					
Contributions and other income Employer contributions Federal government - Medicare Part D	\$	69,423,628 17,898,804	\$ - -	\$ - -	\$ 69,423,628 17,898,804
Total contributions and other income		87,322,432			87,322,432
Investment loss Less investment expenses Net gain from investment activities		(73,653,745) 6,060,077 (79,713,822)	(67,089,061) 5,305,746 (72,394,807)	(8,276,822) 654,681 (8,931,503)	(149,019,628) 12,020,504 (161,040,132)
Income from securities lending Less securities lending expenses Net income from securities lending		85,952 5,581 80,371	78,291 4,886 73,405	9,659 603 9,056	173,902 11,070 162,832
Purchase of units (\$1 per unit)		-	73,048,269	5,608,000	78,656,269
Total additions		7,688,981	726,867	(3,314,447)	5,101,401
DEDUCTIONS					
Claims and claims administration Redemption of units (\$1 per unit) Administrative expenses		82,357,432 - 360,885	- 27,200,000 315,963	- - 38,987	82,357,432 27,200,000 715,835
Total deductions		82,718,317	27,515,963	38,987	110,273,267
Net decrease		(75,029,336)	(26,789,096)	(3,353,434)	(105,171,866)
Fiduciary net position held in trust Beginning of year		818,822,037	729,670,417	90,041,525	1,638,533,979
End of year	\$	743,792,701	\$ 702,881,321	\$ 86,688,091	\$1,533,362,113

See accompanying notes to financial statements.

MONTGOMERY COUNTY CONSOLIDATED RETIREE HEALTH BENEFITS TRUST

NOTES TO FINANCIAL STATEMENTS Year Ended June 30, 2022

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, 2022, the most recent actuarial valuation (full census updated in FY 2021), plan membership consisted of the following:

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

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 2022, the County and other contributing entities contributed \$69,423,628 for current premiums, 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 \$73,048,269 and \$5,608,000 for Montgomery College during FY 2022.

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, 2022. Fair value for private investment funds, including private equity/debt 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 changes to the statements made as a result of new pronouncements during the year ended June 30, 2022.

C. Net OPEB Liability

The components of the Plan's net OPEB liability as of June 30, 2022, were as follows:

Total OPEB	Plan Fiduciary	Net OPEB	Plan Fiduciary Net Position
Liability	Net Position	Liability	as a % of Total OPEB Liability
(a)	(b)	(a-b)	(b/a)
\$1,555,419,125	\$743,792,701	\$811,626,424	47.82%

Actuarial assumptions. The total OPEB liability was determined by an actuarial valuation as of July 1, 2022, using the following actuarial assumptions, applied to all periods included in the measurement, unless otherwise specified:

Valuation Date	July 1, 2022
Measurement Date	June 30, 2022
Actuarial cost method	Entry Age Normal

Discount Rate 6.20% 3.69% 20 Yr. Municipal Bond Rate

Municipal Bond Rate Basis 20-year tax exempt general obligation municipal bond with average rating of AA/Aa

Expected Return on Assets

Vary based on participant group and service. Increases start between 4.25% and 8.25% Salary Increases at hire and decrease to 0.50% after 30 years of service. Increases are net of inflation.

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
Disabled Retirees	Group E, F, G – Pub-2010 Healthy Mortality, Headcount weighted, Public Safety Employees, Sex Distinct, Fully Generational projected from 2010 using scale MP-2018
	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, 2022 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, 2022 are summarized in the following table:

Asset Class	Long-Term Expected Real Rate of Return				
Asset Class					
Domestic Equities	2.20 %				
International Equities	3.00				
Emerging Market Equities	5.90				
Global Equities	3.30				
Private Equity	5.80				
Credit Opportunities	4.20				
High Yield Bonds	0.80				
Emerging Market Debt	1.70				
Directional Hedge Funds	1.80				
Long Duration Fixed Income	(0.60)				
Cash	(0.90)				
Diversifying Hedge Funds	1.70				
Global ILs/Gold	2.50				
Private Real Assets	4.40				
Public Real Assets	2.90				

Discount Rate. A single discount rate of 6.20% was used to measure the total OPEB liability as of June 30, 2022. 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 3.69% 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 (5.20%) or 1-percentage-point higher (7.20%) than the current rate:

	1% Decrease	Discount Rate	1% Increase
	5.20%	6.20%	7.20%
Net OPEB Liability	\$1,005,700,439	\$811,626,424	\$650,506,434

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-percent-point higher (4.68%) than the current healthcare cost trend rate:

	1% Decrease	Trend Rate	1% Increase
	2.68%	3.68%	4.68%
Net OPEB Liability	\$628,536,039	\$811,626,424	\$1,037,749,230

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, 2022:

	Target	
Asset Class	Allocation	
Domestic Equities	18.25	%
International Equities	10.00	
Emerging Market Equities	5.10	
Global Equities	4.65	
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	9.50	
Cash	1.00	
Diversifying Hedge Funds	2.50	
Total Risk Mitigation	13.00	
Global ILs/Gold	16.50	
Private Real Assets	5.00	
Public Real Assets	5.00	
Total Real Assets/Inflation Protection	26.50	
Total	100.00	%

Rate of Return. The annual money-weighted rate of return on the Trust investments, net of investment expenses, for FY 2022 was negative 8.3%. 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:

					Fair	Value Measureme	nts U	sing
			Acti	noted Prices in ive Markets for entical Assets		Significant Other Observable Inputs	Uno	Significant observable Inputs
		6/30/2022		Level I		Level II		Level III
Investments by fair value level								
Debt securities								
Government and agency obligations	\$	37,811,335	\$	-	\$	37,811,335	\$	-
Commercial Mortgage-Backed		792,450		-		792,450		-
Municipal/Provincial obligations		3,041,570		-		3,041,570		-
Corporate bonds		153,057,141				152,146,133		911,008
Total debt securities		194,702,496		-		193,791,488		911,008
Equity securities				_				
Consumer goods		43,612,486		43,612,486		-		-
Communication Services		19,337,972		18,434,754		861,206		42,012
Energy		18,665,497		18,558,014		12,906		94,577
Financials		28,657,472		28,657,472		-		-
Health Care		39,927,418		39,927,418		-		-
Industrials		44,391,625		44,391,625		-		-
Information Technology		60,653,421		60,653,421		-		-
Materials		8,960,925		8,953,299		-		7,626
Real Estate		57,292,242		57,292,242		-		-
Utilities		25,738,487		25,738,487		-		-
Total equity securities		347,237,545		346,219,218		874,112		144,215
Securities lending collateral fund		19,909,255		-		19,909,255		
Total investments by fair value level		561,849,296	\$	346,219,218	\$	214,574,855	\$	1,055,223
Investments measured at the net asset value (NAV)								
Commingled equity funds		235,063,788						
Commingled bond funds		239,278,589						
Hedge fund		91,023,435						
Fund-of-hedge funds		67,958,630						
Private real assets		68,685,212						
Private equity/debt		219,569,359						
Total investments measured at the NAV		921,579,013						
Investments measured at amortized cost								
Short-term investments		78,412,278						
Total investments measured at amortized cost		78,412,278						
Total investments	\$	1,561,840,587						
Investment derivative instruments:								
Foreign exchange contracts	\$	(212,343)	\$	-	\$	(212,343)		
Credit Default Swaps	\$	(170,823)	\$	_	\$	(170,823)		
Credit Detauit Swaps	Ψ	(170,023)	φ		φ	(170,023)		

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

			Unfunded	Redemption	Redemption
	Fair Value	C	ommitments	Frequency	Notice Period
Commingled equity funds	\$ 235,063,788	\$	-	Daily, Weekly, Monthly	0-30 days
Commingled bond funds	239,278,589		-	Daily, Monthly	0-5 days
Hedge fund	91,023,435		-	Monthly	5 days
Fund-of-hedge funds	67,958,630		-	Quarterly	95 days
Private real assets	68,685,212		10,061,952	Not eligible	N/A
Private equity/debt	219,569,359		35,591,855	Not eligible	N/A
Total investments measured at the NAV	\$ 921,579,013	\$	45,653,807		

Commingled Bond Funds and Equity Funds. Five bond fund and eight 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-five 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, 2022. 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-six 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, 2022. 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, 2022, the Trust's fixed income portfolio had the following sensitivity to changes in interest rates as shown below:

ciow.	Effective Duration in		Percentage of
Type of Investment	Years	Fair Value	Portfolio
U.S. Government Obligations	16.33	\$ 37,609,967	7.34 %
Foreign Government Obligations	6.56	201,368	0.04
Commercial Mortgage-Backed Securities	1.13	792,449	0.15
Municipal/Provincial Obligations	14.13	3,041,570	0.59
Corporate Bonds	6.23	153,057,142	29.88
Fixed Income Pooled Funds	N/A	239,278,589	46.70
Short-term Investments and Others *	N/A	78,412,278	15.30
Total Fixed Income Securities		\$ 512,393,363	100.00 %

^{*}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, 2022 are as follows:

Type of Investment	Quality Rating	Fair Value	Percentage of Portfolio
U.S. Government Obligations*	AA+	\$ 37,609,967	7.34 %
Foreign Government Obligations	BBB	125,023	0.02
	BB	76,345	0.01
Commercial Mortgage-Backed Securities	BB	125,470	0.02
	В	89,057	0.02
	Unrated	577,922	0.11
Municipal/Provincial Bonds	AAA	1,893,669	0.37
	AA	899,168	0.18
	A	248,733	0.05
Corporate Bonds	AAA	639,684	0.12
	AA	3,636,498	0.71
	A	11,523,164	2.25
	BBB	30,774,135	6.01
	BB	49,630,485	9.69
	В	41,770,823	8.15
	CCC	10,077,332	1.97
	CC	186,647	0.04
	C	195,147	0.04
	D	92,728	0.02
	Unrated	4,530,499	0.88
Fixed Income Pooled Funds	Unrated	239,278,589	46.70
Short-term Investments and others	Unrated	78,412,278	15.30
Total Fixed Income Securities		\$ 512,393,363	100.00 %

^{*}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:

,853,283
,000,200
,095,586
,407,258
,666,534
,115,758
,890,784
,225,419
,079,411
,023,708
,649,263
,080,713)
,926,291
1 5 4 3 2 1 2

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 2022, 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, 2022, the Trust held 91 long US Treasury futures contracts with a fair value of \$13,432,250. The Trust also held 15 currency futures contracts with a fair value of \$1,165,500 and 386 equity futures contracts with fair value of \$40,747,917. In addition, the Trust held 406 commodity futures contracts with fair value of \$73,378, 618.

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, 2022, the Trust held \$212,839,700 buy foreign exchange contracts and (\$213,052,043) sell foreign exchange contracts. The unrealized loss on the Trust's contracts was \$212,343.

Credit default swaps are credit derivative contracts that enable investors to transfer the credit risk of fixed income securities to another counterparty. As of June 30, 2022, the Trust held one credit default swap sell contract with a fair value of (\$170,823) and notional amount of \$6,189,183.

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, 2022, the fair value of securities on loan was \$86,894,929. Cash received as collateral and the related liability of \$19,909,255 as of June 30, 2022, 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 \$173,902 and 11,070 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 30, 2022:

Securities Lent		Underlying Securities				h Collateral stment Value	
Lent for Cash Collateral:							
Government Obligations		\$ 950,237		\$	-	\$	965,170
Corporate Bonds		17,084,010			-		17,660,239
Equities		1,237,581			-		1,283,846
Lent for Non-Cash Collateral:							
Government Obligations		21,282,640			22,450,137		-
Corporate Bonds		1,682,176			1,733,601		-
Equities		 44,658,285			48,263,534		-
	Total	\$ 86,894,929	. <u> </u>	\$	72,447,272	\$	19,909,255

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, 2022, 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, 2022	June 30, 2021	June 30, 2020
Total OPEB Liability			
Service Cost	\$ 57,865,960	\$ 56,485,667	\$ 50,603,665
Interest Cost	85,811,013	90,817,670	84,115,630
Changes in Benefit Terms	-	(21,037,342)	- · ·
Differences between Expected and Actual Experiences	(8,212,818)	(117,357,835)	76,398,324
Changes of Assumptions	(177,130,712)	78,158,490	69,533,390
Medicare Part D Reimbursement	17,898,804	16,973,453	13,625,461
Benefit Payments	(82,357,432)	(74,561,769)	(69,398,524)
Net Change in Total OPEB Liability	(106,125,185)	29,478,334	224,877,946
Total OPEB Liability – Beginning	 1,661,544,310	 1,632,065,976	 1,407,188,030
Total OPEB Liability – Ending (a)	\$ 1,555,419,125	\$ 1,661,544,310	\$ 1,632,065,976
Plan Fiduciary Net Position			
Contributions - Employer	\$ 69,423,628	\$ 93,686,185	\$ 88,939,381
Net Investment Income (Loss)	(79,633,451)	162,514,922	33,971,605
Medicare Part D Reimbursement	17,898,804	16,973,453	13,625,461
Benefit Payments	(82,357,432)	(74,561,769)	(69,398,524)
Administrative Expense	(360,885)	(343,120)	(341,413)
Net Change in Plan Fiduciary Net Position	(75,029,336)	198,269,671	66,796,510
Plan Fiduciary Net Position – Beginning	818,822,037	620,552,366	 553,755,856
Plan Fiduciary Net Position – Ending (b)	\$ 743,792,701	\$ 818,822,037	\$ 620,552,366
Net OPEB Liability – Ending (a-b)	\$ 811,626,424	\$ 842,722,273	\$ 1,011,513,610
Plan Fiduciary Net Position as a Percentage of Total OPEB Liability	47.82%	49.28%	38.02%
Covered Payroll	\$ 840,692,000	\$ 817,394,000	\$ 803,597,000
Net OPEB Liability as a Percentage of Covered Payroll	 96.54%	 103.10%	 125.87%
Expected Average Remaining Service Years of All Participants	6.41	6.41	6.63
Notes to Schedule:			
Benefit changes:			
None			
Changes of assumptions:			
The discount rate was changed as follows ==>	6.20%	5.28%	5.68%

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

Continued

June 30, 2019	June 30, 2018	June 30, 2017
	,	,
\$ 70,518,206	\$ 65,155,686	\$ 73,126,875
111,580,719	117,685,710	116,270,504
-	-	-
(351,021,508	(1,877,264)	(22,113,781)
(191,917,617	(268,604,422)	(261,363,550)
11,094,679	10,453,719	6,345,721
(66,208,939	(60,773,387)	(63,284,352)
(415,954,460	(137,959,958)	(151,018,583)
1,823,142,490	1,961,102,448	2,112,121,031
\$ 1,407,188,030	\$ 1,823,142,490	\$ 1,961,102,448
	_	
\$ 77,208,188	\$ 63,725,810	\$ 122,466,187
39,922,676	40,066,004	42,759,085
11,094,679	10,453,719	6,345,721
(66,208,939	(60,773,387)	(63,284,352)
(339,355	(276,553)	(4,292,538)
61,677,249	53,195,593	103,994,103
492,078,607	438,883,014	334,888,911
\$ 553,755,856	\$ 492,078,607	\$ 438,883,014
\$ 853,432,174	\$ 1,331,063,883	\$ 1,522,219,434
39.35%	6 26.99%	22.38%
\$ 785,379,904	\$ 766,111,522	\$ 750,986,381
108.66%		202.70%
6.63	3 7.06	7.63
0.0.	7.00	7.03
6.10%	6.26%	5.88%

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
2022	65,113,000	69,423,628	(4,310,628)	840,692,000	8.26

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

Benefit changes None Changes of assumptions None

Methods and assumptions used to determine contribution rates:

Valuation Date 7/1/2022

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:

Rate of Inflation2.40%Rate of Growth in Real Income / GDP per Capita1.25%Excess Medical Growth1.20%Expected Health Share of DCP in 202820.50%Health Share of GDP Resistance Point15.00%Year for Limiting Cost Growth to GDP Growth2040

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.

The actuarially determined contribution and contributions in relation to the actuarially determined contribution are provided as of the measurement date. For example, the FYE 2022 disclosure (using a measurement date of 06/30/2022) is reporting the ADC and contributions made during the period 7/1/2021 - 06/30/2022.

SCHEDULE OF INVESTMENT RETURNS

Fiscal Year Ended June 30	Annual Money Weighted Rate of Return, Net of Investment Expenses
2017	11.99 %
2018	8.82
2019	8.26
2020	4.69
2021	26.09
2022	(8.30)

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



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, 2022, and the related notes to the financial statements, and have issued our report thereon dated September 29, 2022.

Report on Internal Controls 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.



Report on 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.

SB & Company, If C

Owings Mills, Maryland September 29, 2022