

State of Delaware
Other Postemployment Benefits (OPEB) Fund Trust

Schedules of Employer Allocations and OPEB Amounts by Employer

As of and for the Year Ended June 30, 2018

**State of Delaware
OPEB Fund Trust**

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Independent Auditor's Report

The Members of the Board of Pension Trustees
Delaware Public Employees' Retirement System
Dover, DE

Report on the Schedules

We have audited the accompanying schedule of employer allocations of the State of Delaware Other Postemployment Benefits (OPEB) Fund Trust as of and for the year ended June 30, 2018, and the related notes. We have also audited the total for all entities of the columns titled net OPEB liability, total deferred outflows of resources, total deferred inflows of resources, and total employer OPEB expense (specified column totals) included in the accompanying schedule of OPEB amounts by employer of the State of Delaware Other Postemployment Benefits (OPEB) Fund Trust as of and for the year ended June 30, 2018, and the related notes.

Management's Responsibility for the Schedules

Management is responsible for the preparation and fair presentation of these schedules in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the schedules that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express opinions on the schedule of employer allocations and the specified column totals included in the schedule of OPEB amounts by employer 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 schedule of employer allocations and specified column totals included in the schedule of OPEB amounts by employer are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the schedule of employer allocations and specified column totals included in the schedule of OPEB amounts by employer. The procedures selected depend on the auditors' judgment, including the assessment of the risk of material misstatement of the schedule of employer allocation and specified column totals included in the schedule of OPEB amounts by employer, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the schedule of employer allocations and specified column totals included in the schedule of OPEB amounts by employer 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 control. 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 schedule of employer allocations and specified column totals included in the schedule of OPEB amounts by employer.



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

Opinions

In our opinion, the schedules referred to above present fairly, in all material respects, the employer allocations and net OPEB liability, total deferred outflows of resources, total deferred inflows of resources, and total employer OPEB expense for the total of all participating entities for the State of Delaware Other Postemployment Benefits (OPEB) Fund Trust as of and for the year ended June 30, 2018 in accordance with accounting principles generally accepted in the United States of America.

Other Matters

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 State of Delaware Other Postemployment Benefits (OPEB) Fund Trust as of and for the year ended June 30, 2018, and our report thereon, dated November 26, 2018, expressed an unmodified opinion on those financial statements.

Restriction on Use

Our report is intended solely for the information and use of Delaware Public Employees' Retirement System management, the Board of Pension Trustees, State of Delaware Other Postemployment Benefits (OPEB) Fund Trust participating employers, and their auditors, and is not intended to be and should not be used by anyone other than these specified parties.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated May 29, 2019 on our consideration of the State of Delaware Other Postemployment Benefits (OPEB) Fund Trust's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of the report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control 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 State of Delaware Other Postemployment Benefits (OPEB) Fund Trust's internal control over financial reporting and compliance.

BDO USA, LLP

May 29, 2019

**State of Delaware
OPEB Fund Trust
Schedule of Employer Allocations
As of and for the year ended June 30, 2018**

Reporting Unit	Employer Contributions 2018	Employer's Proportionate Share 2018
<i>State of Delaware Entities:</i>		
Academia Antonia Alonso	\$ 204,753	0.0912%
Academy of Dover Charter School	118,787	0.0529%
Campus Community School	226,062	0.1006%
Charter School of New Castle	445,849	0.1985%
Delaware Academy of Public Safety and Security	166,086	0.0739%
Delaware Agricultural Lands Preservation Foundation	11,704	0.0052%
Delaware College Prep Academy	-	0.0000%
Delaware Department of Transportation	7,727,304	3.4401%
Delaware Economic Development Office	195,293	0.0869%
The Delaware MET	-	0.0000%
Delaware Military Academy Charter School	336,615	0.1499%
Delaware State Housing Authority	49,585	0.0221%
Delaware State Lottery	268,793	0.1197%
Delaware State University	5,361,512	2.3869%
Delaware STEM Academy	-	0.0000%
Design Thinking Academy	156,944	0.0699%
Early College High School at DSU	161,789	0.0720%
Eastside Charter School	368,206	0.1639%
First State Military Academy	202,957	0.0904%
First State Montessori Academy	312,034	0.1389%
Freire Charter School	198,576	0.0884%
Gateway Lab School	198,572	0.0884%
General Government (State of DE)	194,460,497	86.5715%
Great Oaks Charter School	189,174	0.0842%
Kuumba Academy Charter School	417,667	0.1859%
Las Americas Aspira Academy	524,241	0.2334%
MOT Charter School	677,069	0.3014%
Newark Charter School	1,587,014	0.7065%
Odyssey Charter School	914,072	0.4069%
Positive Outcomes Charter School	168,431	0.0750%
Prestige Academy Charter School	-	0.0000%
Providence Creek Academy Charter School	310,491	0.1382%
Sussex Academy	402,119	0.1790%
The Charter School of Wilmington	590,882	0.2631%
Thomas A. Edison Charter School	429,169	0.1911%
State of Delaware Entities Sub-Total	217,382,247	96.7759%
<i>Affiliated Entities:</i>		
Delaware Solid Waste Authority	668,864	0.2978%
Delaware State Education Association	6,839	0.0030%
University of Delaware	6,566,314	2.9232%
Total	\$ 224,624,264	100.0000%

See accompanying notes to Schedule of Employer Allocations and Schedule of OPEB Amounts by Employer

**State of Delaware
OPEB Fund Trust
Schedule of OPEB Amounts by Employer
As of and for the year ended June 30, 2018**

Reporting Unit	Deferred Outflows of Resources					Deferred Inflows of Resources					OPEB Expense		
	Net OPEB Liability	Expected and Actual Experience Differences	Assumption Changes	Changes in Proportion	Total Deferred Outflows of Resources	Expected and Actual Experience Differences	Assumption Changes	Projected and Actual Plan Investment Differences	Changes in Proportion	Total Deferred Inflows of Resources	Employer's Proportionate Share	Changes in Proportion	Total Employer OPEB Expense
<i>State of Delaware Entities:</i>													
Academia Antonia Alonso	\$ 7,483,831	\$ -	\$ -	\$ 2,600,829	\$ 2,600,829	\$ -	\$ 1,016,784	\$ 18,803	\$ -	\$ 1,035,587	\$ 305,428	\$ 539,882	\$ 845,310
Academy of Dover Charter School	4,341,737	-	-	-	-	-	589,886	10,909	794,226	1,395,021	177,194	(179,650)	(2,456)
Campus Community School	8,262,682	-	-	456,876	456,876	-	1,122,601	20,760	389,308	1,532,669	337,214	(5,952)	331,262
Charter School of New Castle	16,296,003	-	-	408,591	408,591	-	2,214,040	40,944	163,768	2,418,752	665,067	69,395	734,462
Delaware Academy of Public Safety and Security	6,070,540	-	-	-	-	-	824,768	15,252	830,774	1,670,794	247,749	(187,157)	60,592
Delaware Agricultural Lands Preservation Foundation	427,793	-	-	23,741	23,741	-	58,122	1,075	2,266	61,463	17,459	5,482	22,941
Delaware College Prep Academy	-	-	-	-	-	-	-	-	3,036,411	3,036,411	-	(759,103)	(759,103)
Delaware Department of Transportation	282,436,856	-	-	-	-	-	38,372,999	709,635	757,969	39,840,603	11,526,726	(178,817)	11,347,909
Delaware Economic Development Office	7,138,069	-	-	-	-	-	969,806	17,935	3,226,959	4,214,700	291,317	(660,397)	(369,080)
The Delaware Met	-	-	-	-	-	-	-	-	1,272,316	1,272,316	-	(318,079)	(318,079)
Delaware Military Academy Charter School	12,303,464	-	-	620,492	620,492	-	1,671,598	30,913	-	1,702,511	502,125	127,968	630,093
Delaware State Housing Authority	1,812,358	-	-	-	-	-	246,234	4,554	979,587	1,230,375	73,965	(223,446)	(149,481)
Delaware State Lottery	9,824,521	-	-	-	-	-	1,334,798	24,685	611,495	1,970,978	400,955	(136,247)	264,708
Delaware State University	195,965,955	-	-	-	-	-	26,624,716	492,373	4,784,688	31,901,777	7,997,702	(1,120,304)	6,877,398
Delaware STEM Academy	-	-	-	-	-	-	-	-	475,004	475,004	-	(118,328)	(118,328)
Design Thinking Academy	5,736,375	-	-	2,450,180	2,450,180	-	779,367	14,413	-	793,780	234,111	561,309	795,420
Early College High School at DSU	5,913,452	-	-	1,740,554	1,740,554	-	803,425	14,858	-	818,283	241,338	402,518	643,856
Eastside Charter School	13,458,107	-	-	508,333	508,333	-	1,828,472	33,814	-	1,862,286	549,248	102,733	651,981
First State Military Academy	7,418,173	-	-	3,504,829	3,504,829	-	1,007,863	18,638	-	1,026,501	302,748	779,104	1,081,852
First State Montessori Academy	11,404,995	-	-	4,109,146	4,109,146	-	1,549,528	28,656	-	1,578,184	465,457	957,537	1,422,994
Freire Charter School	7,258,039	-	-	3,589,254	3,589,254	-	986,106	18,236	-	1,004,342	296,213	780,526	1,076,739
Gateway Lab School	7,257,897	-	-	233,619	233,619	-	986,087	18,236	325,973	1,330,296	296,207	(6,790)	289,417
General Government (State of DE)	7,107,629,052	-	-	-	-	-	965,670,855	17,858,226	28,318,131	1,011,847,212	290,074,373	(6,525,162)	283,549,211
Great Oaks Charter School	6,914,390	-	-	3,123,314	3,123,314	-	939,416	17,373	-	956,789	282,188	686,495	968,683
Kuumba Academy Charter School	15,265,931	-	-	2,340,841	2,340,841	-	2,074,090	38,356	-	2,112,446	623,028	531,328	1,154,356
Las Americas Aspira Academy	19,161,282	-	-	4,595,052	4,595,052	-	2,603,328	48,144	-	2,651,472	782,004	968,940	1,750,944
MOT Charter School	24,747,212	-	-	4,772,926	4,772,926	-	3,362,255	62,178	-	3,424,433	1,009,976	1,078,610	2,088,586
Newark Charter School	58,006,173	-	-	5,628,605	5,628,605	-	7,880,950	145,743	-	8,026,693	2,367,330	1,266,671	3,634,001
Odyssey Charter School	33,409,781	-	-	9,818,276	9,818,276	-	4,539,186	83,944	-	4,623,130	1,363,510	2,133,695	3,497,205
Positive Outcomes Charter School	6,156,222	-	-	386,568	386,568	-	836,409	15,468	-	851,877	251,246	86,889	338,135
Prestige Academy Charter School	-	-	-	-	-	-	-	-	5,569,505	5,569,505	-	(1,222,791)	(1,222,791)
Providence Creek Academy Charter School	11,348,613	-	-	234,266	234,266	-	1,541,868	28,513	547,865	2,118,246	463,156	(51,006)	412,150
Sussex Academy	14,697,669	-	-	2,275,656	2,275,656	-	1,996,884	36,929	-	2,033,813	599,837	502,838	1,102,675
The Charter School of Wilmington	21,597,036	-	-	120,836	120,836	-	2,934,260	54,263	444,212	3,432,735	881,412	(58,634)	822,778
Thomas A. Edison Charter School	15,686,338	-	-	405,484	405,484	-	2,131,209	39,412	-	2,170,621	640,186	91,614	731,800
State of Delaware Entities Sub-Total	7,945,430,546	-	-	53,948,268	53,948,268	-	1,079,497,910	19,963,238	52,530,457	1,151,991,605	324,266,469	(78,329)	324,188,140
<i>Affiliated Entities:</i>													
Delaware Solid Waste Authority	24,447,316	-	-	683,887	683,887	-	3,321,510	61,425	-	3,382,935	997,736	166,705	1,164,441
Delaware State Education Association	249,961	-	-	-	-	-	33,961	628	169,331	203,920	10,201	(37,130)	(26,929)
University of Delaware	240,002,102	-	-	6,704,542	6,704,542	-	32,607,644	603,016	8,636,909	41,847,569	9,794,894	(51,246)	9,743,648
Total	\$ 8,210,129,925	\$ -	\$ -	\$ 61,336,697	\$ 61,336,697	\$ -	\$ 1,115,461,025	\$ 20,628,307	\$ 61,336,697	\$ 1,197,426,029	\$ 335,069,300	\$ -	\$ 335,069,300

See accompanying notes to Schedule of Employer Allocations and Schedule of OPEB Amounts by Employer

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Notes to Schedule of Employer Allocations and Schedule of OPEB Amounts by Employer

Note 1: Description of the Plan

The State of Delaware’s Other Postemployment Benefit (OPEB) Fund Trust (the Plan) is a cost-sharing multiple-employer defined-benefit plan established in Delaware Code. The Plan is administered by the Delaware Public Employees’ Retirement System (DPERS). The State of Delaware (the State) is responsible for the policy and management of the OPEB benefits provided to retirees. The Plan’s assets may be used only for the payment of benefits to the members of the Plan in accordance with the terms of the Plan. Additional financial and actuarial information with respect to the Plan may be found in the State of Delaware Other Postemployment Benefits (OPEB) Fund Trust Financial Statements available online at <https://open.omb.delaware.gov/Financials.shtml>.

The Plan provides medical coverage to pensioners and their eligible dependents covered under the following pension plans: State Employees’, New State Police, Judiciary and Closed State Police Pension Plans. This includes the employees of the State as well as employees of the State’s component units and affiliated agencies which are part of the State Employees’ Pension Plan. Those employers are Delaware State University, Delaware State Housing Authority, Delaware Charter Schools, University of Delaware, Delaware Solid Waste Authority, and the Delaware State Education Association. The participant’s cost of Plan benefits is variable based on years of service within those pension plan categories. Pensioners who retire after July 1, 2012 and who become eligible for Medicare will pay an additional 5% of the Medicare Supplement offered by the State. Surviving spouses are eligible for coverage after a retiree’s death.

Participating employers fund the Plan for current retirees on a pay-as-you-go basis along with funding for future benefits at a rate that is approved in the annual budget, but not actuarially determined. By State Statute Chapter 52, Title 29 of the Delaware Code, contribution requirements of plan members and the government are established by the State Legislature. Funds are recorded in the Plan for the payment of retiree healthcare claims, and administrative and investment expenses. Administrative costs are financed through investment earnings. State appropriations, other employer contributions, and retiree contributions for healthcare are recorded in the Plan. The funds available are invested under the management of the DPERS Board of Pension Trustees, which acts as the Board of Trustees for the Plan and is responsible for the financial management of the Plan.

Membership data is as follows:

	June 30, 2018^a
Retirees and Beneficiaries Receiving Benefits:	22,018
Terminated Plan Members Entitled to But Not Yet Receiving Benefits	3,480
Active Eligible Plan Members	37,886
Total Members	63,384

^a Based on census data as of July 1, 2017

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Notes to Schedule of Employer Allocations and Schedule of OPEB Amounts by Employer

Note 2: Basis of Presentation

The Schedules of Employer Allocations and OPEB Amounts by Employer (collectively, the Schedules) present amounts that are considered elements of the financial statements of the Plan or of its participating employers. Accordingly, they do not purport to be a complete presentation of the financial position or changes in financial position of the Plan or the participating employers. The accompanying schedules have been prepared in conformity with United States generally accepted accounting principles as prescribed by the Governmental Accounting Standards Board (GASB). Such preparation requires management of the Plan to make a number of estimates and assumptions relating to the reported amounts. Due to the inherent nature of these estimates, actual results could differ from those estimates.

Note 3: Allocation Methodology

The amounts assigned to each employer in the Schedule of OPEB Amounts by Participating Employer is each employer's proportionate share of the Net OPEB Liability, Deferred Outflows of Resources, Deferred Inflows of Resources and OPEB Expense (the Collective OPEB Amounts) determined in accordance with the Governmental Accounting Standards Board's Statement No. 75 (GASB 75), *Accounting and Financial Reporting for Postemployment Benefits Other than Pensions*. Management has elected to allocate the employer's proportionate shares of the Collective OPEB Amounts based on the percentage of actual employer contributions during the period July 1, 2017 through June 30, 2018.

Note 4: Collective Net OPEB Liability and Actuarial Information

The components of the collective net OPEB liability of the participating employers are as follows (expressed in thousands):

	<u>June 30, 2018</u>
Total OPEB Liability	\$ 8,591,767
Fiduciary Net Position	<u>(381,637)</u>
Net OPEB Liability	<u>\$ 8,210,130</u>

Actuarial Assumptions

The collective total OPEB liability for the June 30, 2018 measurement date was determined by an actuarial valuation as of June 30, 2017, with update procedures used to roll forward the total OPEB liability to June 30, 2018. This actuarial valuation used the following actuarial assumptions:

<u>Actuarial assumptions:</u>	<u>June 30, 2018</u>
Discount rate	3.87%
Projected salary increases	3.25% + Merit
Healthcare cost trend rates	6.80%

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Notes to Schedule of Employer Allocations and Schedule of OPEB Amounts by Employer

Mortality rates are based on the sex-distinct employee, healthy annuitant, and disabled annuitant mortality tables derived from the RP-2014 Total Dataset Employee Mortality Table, including adjustment factors. Future mortality improvements are reflected by applying a custom projection scale on a generational basis to adjusted base tables from the base year.

The total OPEB liabilities are measured based on assumptions pertaining to the interest rates, inflation rates, health costs, and employee demographic behavior in future years. The assumptions used were based on the results of an actuarial experience study conducted in 2016. It is likely that future experience will not exactly conform to these assumptions. To the extent that actual experience deviates from these assumptions, the emerging liabilities may be higher or lower than anticipated. The more the experience deviates the larger the impact on future financial statements.

Discount Rate

The discount rate used to measure the total OPEB liability was 3.58 percent at the beginning of the current measurement period and 3.87 percent at the end, based on the Bond Buyer GO 20-Bond Municipal Bond Index. The projection of cash flows used to determine the discount rate assumed that contributions from plan members will be made at the current contribution rate and that employer contributions to the Plan will continue to follow the pay-as-you-go contribution policy. Based on the assumptions of a pay-as-you-go plan, the discount rate used at the June 30, 2018 measurement date is equal to the applicable rate of the 20-year, tax-exempt general obligation municipal bonds with an average rating of AA/Aa or higher.

Sensitivity of the Collective Net OPEB Liability to Changes in the Discount Rate

The following presents the net OPEB liability of the Plan, as well as what the Plan’s net OPEB liability would be if it were calculated using a discount rate that is 1-percentage-point lower or 1-percentage-point higher than the current discount rate (dollar amounts expressed in thousands):

	1% Decrease (2.87%)	Discount Rate (3.87%)	1% Increase (4.87%)
Collective Net OPEB Liability	\$ 9,769,869	\$ 8,210,130	\$ 6,983,756

Sensitivity of the Net OPEB Liability to Changes in the Healthcare Cost Trend Rates

The following presents the net OPEB liability of the Plan, as well as what the Plan’s net OPEB liabilities would be if it were calculated using healthcare cost trend rates that are 1-percentage-point lower or 1-percentage-point higher than the current healthcare cost trend rates (dollar amounts in thousands):

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Notes to Schedule of Employer Allocations and Schedule of OPEB Amounts by Employer

	1% Decrease (5.8%)	Healthcare Trend (6.8%)	1% Increase (7.8%)
Collective Net OPEB Liability	\$ 6,990,456	\$ 8,210,130	\$ 9,695,444

Note 5: Collective Deferred Outflows of Resources and Deferred Inflows of Resources

The components of collective deferred outflows of resources and deferred inflows of resources are amortized into OPEB expense over a six-year closed period beginning the year in which the difference occurs, except for differences in projected and actual investment returns which are amortized over a five-year period. The cumulative amounts of collective net deferred outflows (inflows) of resources and deferred inflows of resources will be recognized in OPEB expense as follows (expressed in thousands):

Year ending June 30:	
2019	\$ (267,822)
2020	(267,822)
2021	(267,822)
2022	(263,736)
2023	(68,887)

Note 6: Collective OPEB Expense

The components of collective OPEB expense for the year ending June 30, 2018 are as follows (expressed in thousands):

Service Cost	\$ 306,562
Interest Cost	309,767
Contributions	(157)
Administrative Expenses	88
Expected Return on Assets	(13,369)
Recognition of deferred outflows and inflows of resources:	
Differences between projected and actual earnings on plan investments	(6,179)
Changes in assumption with regards to factors or other inputs in the measurement of total OPEB liability	(261,643)
OPEB Expense	\$ 335,069



Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Schedules Performed in Accordance with *Government Auditing Standards*

Members of the Board of Pension Trustees
Delaware Public Employees' Retirement System
Dover, DE

We have audited, in accordance with the 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 schedule of employer allocations and the total for all entities of the columns titled net OPEB liability, total deferred outflows of resources, total deferred inflows of resources, and total employer OPEB expense as of and for the year ended June 30, 2018 (specified column totals), included in the schedule of OPEB amounts by employer of the State of Delaware Other Postemployment Benefits (OPEB) Fund Trust (the Trust) (hereafter collectively referred to as the Schedules) and the related notes and have issued our report thereon dated May 29, 2019.

Internal Control over Financial Reporting

In planning and performing our audit of the Schedules, we considered the Trust's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the Schedules, but not for the purpose of expressing an opinion on the effectiveness of the Trust's internal control. Accordingly, we do not express an opinion on the effectiveness of the Trust's internal control.

A deficiency in internal control 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 combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Schedules 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 control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control 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 Schedules 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 determination of the Schedules amounts. 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 control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Trust's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Trust's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

BDO USA, LLP

May 29, 2019