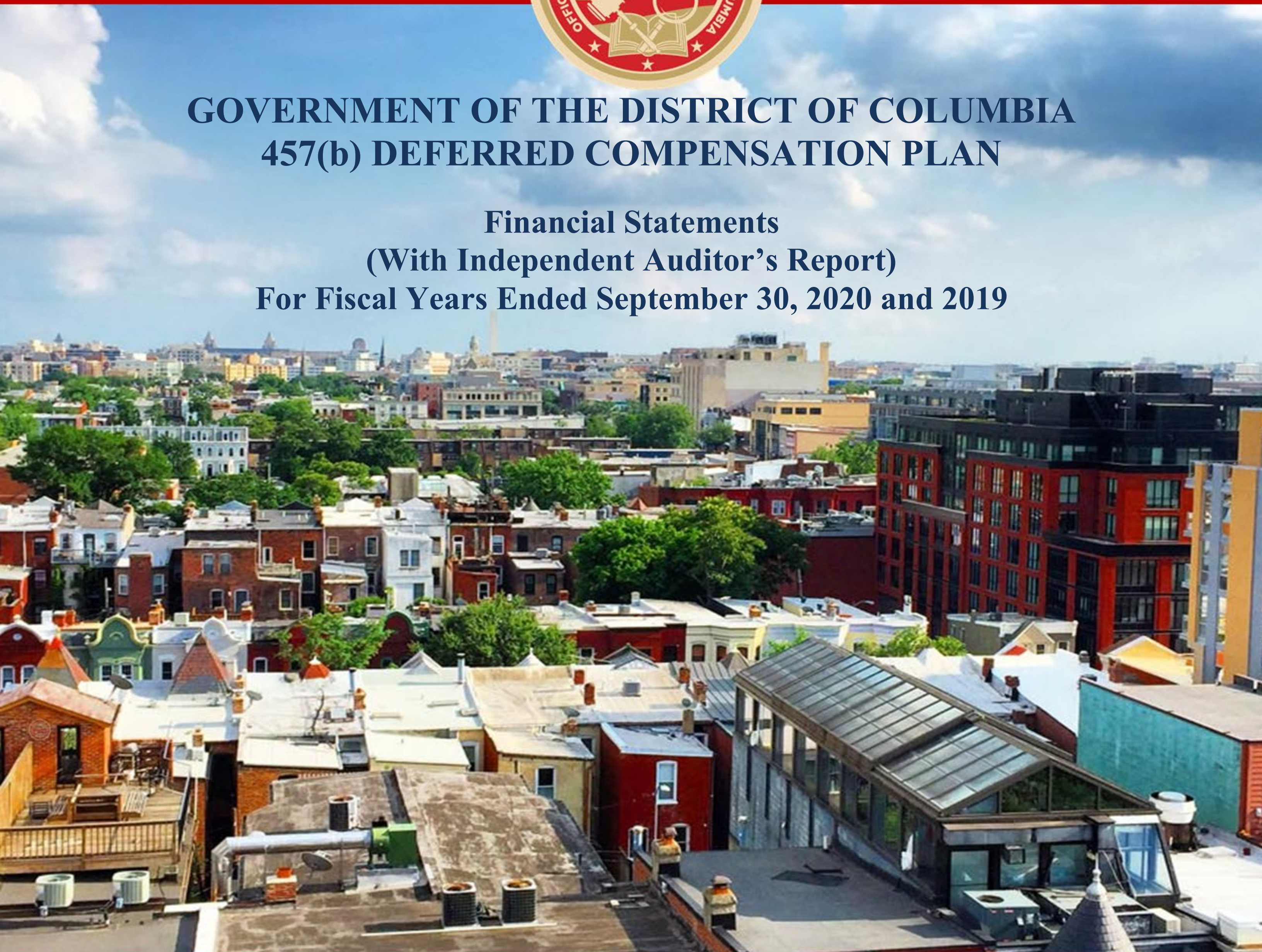
DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL

OIG Project No. 21-1-20AT

January 2021



GOVERNMENT OF THE DISTRICT OF COLUMBIA
457(b) DEFERRED COMPENSATION PLAN

Financial Statements
(With Independent Auditor's Report)
For Fiscal Years Ended September 30, 2020 and 2019

Guiding Principles

*Workforce Engagement * Stakeholders Engagement * Process-oriented * Innovation*
** Accountability * Professionalism * Objectivity and Independence * Communication * Collaboration*
** Diversity * Measurement * Continuous Improvement*

Mission

Our mission is to independently audit, inspect, and investigate matters pertaining to the District of Columbia government in order to:

- prevent and detect corruption, mismanagement, waste, fraud, and abuse;
- promote economy, efficiency, effectiveness, and accountability;
- inform stakeholders about issues relating to District programs and operations; and
- recommend and track the implementation of corrective actions.

Vision

Our vision is to be a world-class Office of the Inspector General that is customer-focused and sets the standard for oversight excellence!

Core Values

Excellence * Integrity * Respect * Creativity * Ownership * Transparency * Empowerment * Courage * Passion * Leadership

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General

OIG

January 29, 2021

The Honorable Muriel Bowser
Mayor of the District of Columbia
Mayor's Correspondence Unit
1350 Pennsylvania Avenue, N.W., Suite 316
Washington, D.C. 20004

The Honorable Phil Mendelson
Chairman
Council of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, N.W., Suite 504
Washington, D.C. 20004

Dear Mayor Bowser and Chairman Mendelson:

Enclosed is the final report entitled *Government of the District of Columbia 457(b) Deferred Compensation Plan Financial Statements (With Independent Auditor's Report) for the Fiscal Years Ended September 30, 2020 and 2019* (OIG No. 21-1-20AT). F.S. Taylor & Associates, P.C. (FSTaylor) conducted the audit and submitted this component report as part of our overall contract for the audit of the District of Columbia's general-purpose financial statements for fiscal year 2020.

On January 17, 2021, FSTaylor issued its opinion and concluded that the financial statements are presented fairly in all material respects, in accordance with accounting principles generally accepted in the United States of America. FSTaylor identified no material weaknesses in internal control over financial reporting.

If you have questions about this report, please contact me or Fekede Gindaba, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,

Daniel W. Lucas
Inspector General

DWL/ws

Enclosure

cc: See Distribution List

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Mr. Wayne McConnell, Managing Partner, McConnell & Jones LLP (via email)

GOVERNMENT OF THE DISTRICT OF COLUMBIA
457(b) DEFERRED COMPENSATION PLAN

FINANCIAL STATEMENTS
WITH INDEPENDENT AUDITOR'S REPORT

YEARS ENDED SEPTEMBER 30, 2020 AND 2019

GOVERNMENT OF THE DISTRICT OF COLUMBIA
457(b) DEFERRED COMPENSATION PLAN

FINANCIAL STATEMENTS
WITH INDEPENDENT AUDITOR'S REPORT

YEARS ENDED SEPTEMBER 30, 2020 AND 2019

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F.S. TAYLOR & ASSOCIATES, P.C.

CERTIFIED PUBLIC ACCOUNTANTS & MANAGEMENT CONSULTANTS

1420 N Street, N.W., Suite 100 / Washington, D.C. 20005 / 202/898-0008 Fax 202/898-0208

INDEPENDENT AUDITOR'S REPORT

Office of Finance and Treasury
Office of the Chief Financial Officer
Government of the District of Columbia

Report on the Financial Statements

We have audited the accompanying statements of fiduciary net position of the Government of the District of Columbia 457(b) Deferred Compensation Plan (the "Plan") as of September 30, 2020 and 2019, and the related statements of changes in fiduciary net position for the years then ended and the related notes to the financial statements, which collectively comprise the basic financial statements.

Management's Responsibility for the Financial Statements

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 control 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 the financial statements based on our audits. We conducted our audits 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 financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the Plan's preparation and fair presentation of the 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 Plan'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 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 net position of the Plan, as of September 30, 2020 and 2019, and the changes in net position for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matter

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis on pages 3 through 9 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 December 17, 2020 on our consideration of the Plan's internal control 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 control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Plan's 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 Plan's internal control over financial reporting and compliance.

F. S. Taylor & Associates, P.C.

December 17, 2020
Washington, D.C.

The following presents our discussion and analysis of the financial performance of the Government of the District of Columbia's 457(b) Deferred Compensation Plan (the "Plan") for the fiscal years ended September 30, 2020 and 2019. This discussion and analysis should be read in conjunction with the financial statements and note disclosures.

Under the District's Deferred Compensation Act of 1984, D.C. Law 5-118, and D.C. Code Section 47-3601, the Government of the District of Columbia (the "District") offers for eligible employees a qualified employee deferred compensation plan. The Plan enables eligible employees to make tax deferred contributions towards their retirement. The duties of the Plan's Administrator are performed jointly by the District's Office of the Chief Financial Officer, Office of Finance and Treasury and the D.C. Department of Human Resources.

Overview of Financial Statements

The Plan financial statements consist of two basic financial statements: (a) Statement of Fiduciary Net Position and (b) Statement of Changes in Fiduciary Net Position. In addition to the basic financial statements are the notes to the financial statements.

- Statement of Fiduciary Net Position presents the Plan's assets, liabilities and net position restricted for participant benefits.

- Statement of Changes in Fiduciary Net Position presents the additions to and deductions from the Plan's net position.

- The notes to the financial statements provide a detailed discussion of key accounting policies and activities that occurred during the year. The notes provide additional information that is essential to a full understanding of the information provided in the financial statements.

2020 Financial Highlights

- Investments increased by $80,776,577 or 9.26%
- Receivables increased by $4,478,091 or 13.61%
- Net investment income was $47,494,196, an increase of $34,376,000 or 262.05%
- Benefits paid to participants increased by $14,139,532 or 28.87%

2019 Financial Highlights

- Investments increased by $49,798,765 or 6.05%
- Receivables increased by $2,096,964 or 6.81%
- Net investment income was $13,118,196, a decrease of $54,293,270 or 80.54%
- Benefits paid to participants increased by $1,444,986 or 3.04%

Financial Analysis – Fiduciary Net Position

Table 1 – Condensed Statements of Fiduciary Net Position as of September 30, 2020, 2019 and 2018

				2020-2019		2019-2018	
	2020	2019	2018	Variance	% Variance	Variance	% Variance
ASSETS							
Investments	$ 953,444,823	$ 872,668,246	$ 822,869,481	$ 80,776,577	9.26%	$ 49,798,765	6.05%
Receivables	37,376,780	32,898,689	30,801,725	4,478,091	13.61%	2,096,964	6.81%
Total Assets	990,821,603	905,566,935	853,671,206	85,254,668	9.41%	51,895,729	6.08%
LIABILITIES							
Due to District Government	773,364	499,875	337,277	273,489	54.71%	162,598	48.21%
Total Liabilities	773,364	499,875	337,277	284,551	56.92%	162,598	48.21%
Fiduciary Net Position Available for Plan Benefits	$ 990,048,239	$ 905,067,060	$ 853,333,929	$ 84,970,117	9.39%	$ 51,733,131	6.06%

Fiscal Year 2020

The Plan's investments increased by $80,776,577 or 9.26% over the prior fiscal year. The increase is primarily due to having a diversified investment portfolio to offset the fluctuations in the market and the excess of contributions over benefit payments. For fiscal year 2020, there was a net appreciation in the fair value of investments and an increase in dividends and interest income. Of the 30 managed investment funds 27 had a positive rate of return in fiscal year 2020. VantageBroker accounts are funds held in the "Self-Directed Brokerage Accounts".

As shown in **Table 2a - Investment by Fund with Rates of Returns as of September 30, 2020**, a significant portion of the Plan's investments remain in Vantagepoint Plus Fund (27.1%), Vanguard Institutional Index Fund (11.0%), DCPLUS Large Cap Value Portfolio (8.3%), Ariel Institutional (6.0%) and the DCPLUS Large Cap Growth Portfolio (5.0%). The Vantagepoint PLUS Fund invests primarily in a diversified portfolio of stable value insurance contracts and fixed income securities that back certain stable value investment contracts and seeks to provide preservation of principal and maximize current yield. The Vanguard Institutional Index Fund invests primarily in equity securities of U.S. companies in the Standard & Poor's 500 Index. The DCPLUS Large Cap Value Portfolio invests primarily in large capitalization common stocks and seeks growth in capital.

Receivables are comprised of notes receivable from participants and contributions receivable. For the fiscal year 2020, receivables increased by $4,478,091 or 13.61% due to an increase in participant loans and contributions receivable.

The amount "Due to District Government" represents funds owed to the District by the Plan Administrator, which is used towards paying the Plan's administrative expenses. The Program Manager provides revenue sharing funds to the Plan Administrator on a monthly basis. The funding is equal to 5.5 basis points (0.055%) of the Plan's daily asset value.

Table 2a - Investment by Fund with Rates of Returns as of September 30, 2020

	Investment Value	Percent of Total Assets	Rate of Return %
American Funds Fundamental Investors	$ 25,020,727	2.6	12.28
American Funds New Perspective Fund	15,280,806	1.6	25.74
Ariel Institutional	57,089,777	6.0	-8.75
Brown Capital Management Small	38,453,296	4.0	27.17
DCPLUS Fixed Income Portfolio	38,151,280	4.0	6.43
DCPLUS Large Cap Growth Portfolio	47,696,478	5.0	34.29
DCPLUS Large Cap Value Portfolio	78,766,449	8.3	-10.82
DFA US Core Equity 1 Portfolio	5,780,730	0.6	9.14
Harbor International Institutional	27,870,435	2.9	2.81
Nuveen Real Estate Securities Fund	9,205,700	1.0	-13.57
PIMCO All Asset Fund Institutional Class	374,303	0.0	0.84
PIMCO Real Return Collective Trust II	6,045,645	0.6	11.05
Vanguard Federal Money Market	13,734,088	1.4	0.87
Vanguard Institutional Index Fund	104,929,411	11.0	15.15
Vanguard Small Cap Index Fund	21,362,559	2.3	1.35
Vanguard Target Retirement 2015 Fund	6,200,470	0.7	7.75
Vanguard Target Retirement 2020 Fund	13,728,022	1.4	8.59
Vanguard Target Retirement 2025 Fund	23,630,576	2.5	9.16
Vanguard Target Retirement 2030 Fund	25,360,048	2.7	9.48
Vanguard Target Retirement 2035 Fund	28,265,710	3.0	9.80
Vanguard Target Retirement 2040 Fund	22,275,508	2.3	10.10
Vanguard Target Retirement 2045 Fund	23,637,503	2.5	10.30
Vanguard Target Retirement 2050 Fund	21,728,027	2.3	10.38
Vanguard Target Retirement 2055 Fund	11,879,010	1.2	10.38
Vanguard Target Retirement 2060 Fund	4,049,241	0.4	10.45
Vanguard Target Retirement 2065 Fund	976,117	0.1	10.40
Vanguard Target Retirement Inc.	6,617,641	0.7	7.47
Vantagepoint Plus Fund	257,797,242	27.1	2.31
VantageBroker**	9,572,678	1.0	N/A**
Virtus Emerging Markets Fund Class 1	4,157,093	0.4	5.57
VT Retirement Income Advantage	3,808,253	0.4	9.31
	$ 953,444,823	100.0	

**VantageBroker (formerly TD Ameritrade) are funds held in the "Self-Directed Brokerage Accounts."

Fiscal Year 2019

The Plan's investments increased by $49,798,765 or 6.05% over the prior fiscal year. The increase is primarily due to having a diversified investment portfolio to offset the fluctuations in the market and the excess of contributions over benefit payments. For fiscal year 2019, there was a net depreciation in the fair value of investments and an increase in dividends and interest income. All investments experienced a substantial decrease in their rates of return from 2018, however, 25 of 30 investment funds had a positive rate of return in fiscal year 2019.

As shown in **Table 2b - Investment by Fund with Rates of Returns as of September 30, 2019**, a significant portion of the Plan's investments remain in Vantage Trust PLUS Fund (28.2%), Vanguard Institutional Index Fund (11.1%), DCPLUS Large Cap Value Portfolio (10.8%) and the Ariel Institutional (7.9%). The Vantage Trust PLUS Fund invests primarily in a diversified portfolio of stable value insurance contracts and fixed income securities that back certain stable value investment contracts and seeks to provide preservation of principal and maximize current yield. The Vanguard Institutional Index Fund invests primarily in equity securities of U.S. companies in the Standard & Poor's 500 Index. The DCPLUS Large Cap Value Portfolio invests primarily in common and large capitalization stocks and seeks growth in capital.

Receivables are comprised of notes receivable from participants and contributions receivable. For the fiscal year 2019, receivables increased by $2,096,964 or 6.81% due to an increase in participant loans and participant contributions received after the end of the fiscal year.

The amount "Due to District Government" represents funds owed to the District by the Plan Administrator, which is used towards paying the Plan's administrative expenses. The Program Manager provides revenue sharing funds to the Plan Administrator on a monthly basis. The funding is equal to 5.5 basis points (0.055%) of the Plan's daily asset value.

Table 2b - Investment by Fund with Rates of Returns as of September 30, 2019

	Investment Value	Percent of Total Assets	Rate of Return %
American Funds Fundamental Investors	$ 22,015,492	2.5	0.97
American Funds New Perspective Fund	11,067,125	1.3	2.88
Ariel Institutional	68,869,090	7.9	-6.86
Brown Capital Management Small	32,555,767	3.7	-6.23
DCPLUS Fixed Income Portfolio	30,775,519	3.5	10.15
DCPLUS Large Cap Growth Portfolio	35,502,071	4.1	-0.05
DCPLUS Large Cap Value Portfolio	94,486,978	10.8	3.97
DFA US Core Equity 1 Portfolio	4,081,567	0.5	0.21
Harbor International Institutional	26,311,424	3.0	-3.35
Nuveen Real Estate Securities Fund	10,481,167	1.2	18.77
PIMCO All Asset Fund Institutional Class	345,437	0.0	4.04
PIMCO Real Return Collective Trust II	3,752,781	0.4	6.35
Vanguard Federal Money Market	7,975,573	0.9	2.26
Vanguard Institutional Index Fund	96,868,893	11.1	4.24
Vanguard Small Cap Index Fund	21,019,081	2.5	-3.80
Vanguard Target Retirement 2015 Fund	5,897,557	0.7	6.08
Vanguard Target Retirement 2020 Fund	14,119,754	1.6	5.35
Vanguard Target Retirement 2025 Fund	20,653,078	2.4	4.95
Vanguard Target Retirement 2030 Fund	19,398,830	2.2	4.25
Vanguard Target Retirement 2035 Fund	21,676,289	2.5	3.49
Vanguard Target Retirement 2040 Fund	18,299,328	2.1	2.83
Vanguard Target Retirement 2045 Fund	17,725,497	2.0	2.32
Vanguard Target Retirement 2050 Fund	14,603,075	1.7	2.14
Vanguard Target Retirement 2055 Fund	6,833,039	0.8	2.14
Vanguard Target Retirement 2060 Fund	1,950,364	0.2	2.14
Vanguard Target Retirement 2065 Fund	431,522	0.1	2.25
Vanguard Target Retirement Inc.	6,220,616	0.7	6.82
Vantage Trust Plus Fund	246,335,190	28.2	2.44
VantageBroker**	6,173,354	0.7	1.00
Virtus Emerging Markets Fund Class 1	3,469,268	0.4	5.91
VT Retirement Income Advantage	2,773,520	0.3	3.09
	$ 872,668,246	100.0	

**VantageBroker (formerly TD Ameritrade) are funds held in the "Self-Directed Brokerage Accounts."

Financial Analysis – Changes in Fiduciary Net Position

Table 3 – Condensed Statements of Changes in Fiduciary Net Position for the Years Ended September 30, 2020, 2019 and 2018

				2020-2019		2019-2018	
	2020	2019	2018	Variance	%Variance	Variance	%Variance
ADDITIONS							
Employee Contributions	$ 100,008,009	$ 87,153,299	$ 76,834,685	$ 12,854,710	14.75%	$ 10,318,614	13.43%
Net Investment Income	47,494,196	13,118,196	67,411,466	34,376,000	262.05%	(54,293,270)	-80.54%
Interest Income on Notes Receivable from Participants	1,384,165	1,190,395	866,817	193,770	16.28%	323,578	37.33%
Total Additions	148,886,370	101,461,890	145,112,968	47,424,480	46.74%	(43,651,078)	-30.08%
DEDUCTIONS							
Benefits Paid to Participants	63,122,939	48,983,407	47,538,421	14,139,532	28.87%	1,444,986	3.04%
Administrative Expenses	368,361	342,743	328,790	25,618	7.47%	13,953	4.24%
Loan Fees	413,891	402,609	301,238	11,282	2.80%	101,371	33.65%
Total Deductions	63,905,191	49,728,759	48,168,449	14,176,432	28.51%	1,560,310	3.24%
Net Increase	84,981,179	51,733,131	96,944,519	33,248,048	64.27%	(45,211,388)	-46.64%
Fiduciary Net Position Available for Plan Benefit, Beginning of Year	905,067,060	853,333,929	756,389,410	51,733,131	6.06%	96,944,519	12.82%
Fiduciary Net Position Available for Plan Benefit, End of Year	$ 990,048,239	$ 905,067,060	$ 853,333,929	$ 84,981,179	9.39%	$ 51,733,131	6.06%

Fiscal Year 2020

Employee contributions increased by $12,854,710 or 14.75% compared to prior fiscal year. There was an overall increase in the average number of Plan participants making contributions to the Plan. The number of active Plan participants who made contributions increased from 17,162 in fiscal year 2019 to 19,386 in fiscal year 2020. The average monthly contributions decreased from $402.33 in fiscal year 2019 to $398.99 in fiscal year 2020. The prior year average monthly contributions amount has been revised from $454.14 to reflect the current calculation methodology.

In fiscal year 2020, the Plan's net investment income was $47,494,196 compared to $13,118,196 in fiscal year 2019. The increase in net investment income was primarily due to higher fund performance in fiscal year 2020 compared with 2019. Overall, 27 of the 30 managed funds in the Plan reflected positive rates of return. VantageBroker accounts are funds held in the "Self-Directed Brokerage Accounts". The Plan's investments collectively had a weighted average rate of return of 6.84% in fiscal year 2020 compared to 1.81% in fiscal year 2019.

Benefits paid to participants increased by $14,139,532 or 28.87%. The increase was due to more participants requesting payouts in fiscal year 2020 compared to fiscal year 2019.

The administrative expenses for fiscal year 2020 were expenses incurred by the Program Manager and Plan Administrator for operations of the Plan. The Program Manager receives an administrative fee of 0.22% (22.0 basis points) of the Plan's daily asset value and reimburses the Plan Administrator at 0.055% (5.5 basis points) of the Plan's daily asset value or $368,361.

Fiscal Year 2019

Employee contributions increased by $10,318,614 or 13.43% compared to fiscal 2018. There was an overall increase in the average number of Plan participants making contributions to the Plan. The number of active Plan participants who made contributions increased from 15,158 in fiscal year 2018 to 17,162 in fiscal year 2019. In addition, the average monthly contributions increased from $417.80 in fiscal year 2018 to $454.14 in fiscal year 2019.

In fiscal year 2019, the Plan's net investment income was $13,118,196 compared to $67,411,466 in fiscal year 2018. The decrease in net investment income was primarily due to lower fund performance in fiscal year 2019 compared with 2018. Overall, 25 of the 30 funds in the Plan reflected positive rates of return in fiscal year. The Plan's investments collectively had a weighted average rate of return of 1.81% in fiscal year 2019 compared to 9.31% in fiscal year 2018.

Benefits paid to participants increased by $1,444,986 or 3.04% in fiscal year. The increase was due to more participants requesting payouts in fiscal year 2019 compared to fiscal year 2018.

The administrative expenses for fiscal year 2019 were expenses incurred by the Program Manager and Plan Administrator for operations of the Plan. The Program Manager receives an administrative fee of 0.22% (22.0 basis points) of the Plan's daily asset value and reimburses the Plan Administrator at 0.055% (5.5 basis points) of the Plan's daily asset value or $342,743.

Contact Information

The above discussion and analysis are presented to provide additional information regarding the activities of the Plan and also to meet the disclosure requirements of Government Accounting Standards Board. If you have any questions about the report or need additional financial information, contact the Program Director, Rodney Dickerson, Government of the District of Columbia, (202)727-0107, 1101 4th Street, SW, Washington, DC 20024, or Rodney.Dickerson@dc.gov.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
457(b) DEFERRED COMPENSATION PLAN
STATEMENTS OF FIDUCIARY NET POSITION
SEPTEMBER 30, 2020 AND 2019

	2020	2019
ASSETS		
Investments:		
Registered Investment Companies	$ 686,074,903	$ 620,159,702
Vantagepoint PLUS Stable Value Fund	257,797,242	246,335,190
Self-Directed Brokerage Accounts	9,572,678	6,173,354
Total Investments	953,444,823	872,668,246
Receivables:		
Due from Program Manager	31,769	29,526
Notes Receivable from Participants	33,594,791	29,656,381
Participant Contributions	3,750,220	3,212,782
Total Receivables	37,376,780	32,898,689
Total Assets	990,821,603	905,566,935
LIABILITIES		
Due to District Government	773,364	499,875
Total Liabilities	773,364	499,875
Fiduciary Net Position Available for Plan Benefits	$ 990,048,239	$ 905,067,060

The accompanying notes are an integral part of the financial statements

GOVERNMENT OF THE DISTRICT OF COLUMBIA
457(b) DEFERRED COMPENSATION PLAN
STATEMENTS OF CHANGES IN FIDUCIARY NET POSITION
FOR THE YEARS ENDED SEPTEMBER 30, 2020 AND 2019

	2020	2019
ADDITIONS		
Employee Contributions	$ 100,008,009	$ 87,153,299
Investment Income:		
Appreciation (Depreciation) in Fair Value of Investments	37,616,133	(4,730,412)
Dividends and Interest Income	15,008,344	22,758,858
Less: Investment Management Expenses	(3,903,844)	(3,791,040)
Program Manager Fees	(1,226,437)	(1,119,210)
Net Investment Income	47,494,196	13,118,196
Interest Income on Notes Receivable from Participants	1,384,165	1,190,395
Total Additions	148,886,370	101,461,890
DEDUCTIONS		
Benefits Paid to Participants	63,122,939	48,983,407
Administrative Expenses	368,361	342,743
Loan Fees	413,891	402,609
Total Deductions	63,905,191	49,728,759
Net Increase	84,981,179	51,733,131
Fiduciary Net Position Available for Plan Benefits, Beginning of Year	905,067,060	853,333,929
Fiduciary Net Position Available for Plan Benefits, End of Year	$ 990,048,239	$ 905,067,060

The accompanying notes are an integral part of the financial statements

NOTE 1 - DESCRIPTION OF PLAN

The Government of the District of Columbia (the "District") offers for eligible employees a qualified employee Deferred Compensation Plan ("Plan") that was established under the District's 457(b) Deferred Compensation Act of 1984, D.C. Law 5-118, and D.C. Code Section 47-3601. The Plan enables eligible employees to make tax deferred contributions towards their retirement. The Plan's assets are held in trust by the District for the exclusive benefit of Plan members and their beneficiaries. All District employees of an agency under the personnel authority of the District's Mayor, a subordinate agency as defined in the Comprehensive Merit Personnel Act of 1978, and an agency not under the personnel authority of the Mayor or an independent agency, but approved by the Mayor, are eligible to participate in the Plan. There are no age and length of service requirements.

Effective January 1, 2009, the blind licensees of the District's Randolph Sheppard Vending Facility Program became eligible to participate in the Plan. The blind licensees under the Randolph Sheppard Vending Facility Program shall not become an eligible individual until the later of the date (i) such as licensee has been a participant in the program for 13 months or (ii) a year and one month after their licensure date.

Effective October 1, 2017, the District Comprehensive Merit Personnel Act of 1978, Section 2609(b), made by the Fiscal Year 2018 Budget Support Act of 2017 was amended for employees of the Council, the Office of the District Auditor and the Office of Advisory Neighborhood Commissions (collectively, "Agencies"). It provided for mandatory matching contributions for employees of those Agencies participating in the Deferred Compensation Plan ("Plan") who make a pre-tax contribution or Roth contribution under the Plan for each pay period in an amount equal to one hundred percent (100%) of such employee's Pre-Tax contributions and Roth contributions made during each such pay period, but not in excess of three percent (3%) of the employee's base salary during such pay period. Matching contributions are made in the Government of the District of Columbia 401(a) Defined Contribution Retirement Plan.

Effective July 7, 2019, the District amended the Deferred Compensation Plan to provide automatic enrollment pursuant to the Deferred Compensation Program Enrollment Amendment Act of 2018. Automatic enrollment means any eligible employee hired on or after July 7, 2019 and any eligible employee rehired on or after July 7, 2019, after having a break in service of three (3) consecutive workdays or more shall automatically be enrolled in the Deferred Compensation Plan. Contributions shall be no less than 5% of their pre-tax annual base salary upon hire until such automatically enrolled participant makes an affirmative election to defer a different amount or percentage amount (including zero).

NOTE 1 - DESCRIPTION OF PLAN (Continued)

The District's Office the Chief Financial Officer, Office of Finance and Treasury ("OCFO-OFT") and the District of Columbia Department of Human Resources are joint Plan Administrators. They are jointly responsible for adopting the Plan's administration rules and regulations and investment policies and overseeing the duties of the Trustee of the Plan. The Program Manager is responsible for the Plan's record keeping, marketing and enrollment efforts. In 2015, the OCFO-OFT contracted with ICMA Retirement Corporation (ICMA-RC) to be the Plan's Program Manager. The Program Manager maintains an account for each participant that is adjusted for contributions, distributions, and investment earnings and losses. Participants can contribute to the Plan up to $19,500 for 2020 and $19,000 for 2019 or 100% of the participants' includible compensation. Participants who are at least age 50 can contribute up to $26,000 for 2020 and $25,000 for 2019 to the Plan. Participants who qualify for pre-retirement catch-up contributions can contribute up to $39,000 for 2020 and $38,000 for 2019 to the Plan. Participants are vested immediately.

Participants can receive a distribution of their assets upon retirement, termination of service, death, or for an emergency hardship. However, under Section 2202 of the CARES Act, enacted on March 27, 2020, a coronavirus-related distribution up to $100,000 across all retirement plans can be made to qualified individuals from January 1, 2020 to December 31, 2020.

Generally, at the date beginning April 1 of the calendar year following the later of: (1) the calendar year in which the participant reaches age 72 (age 70 ½ for individuals attaining that age before 2020), or (2) the calendar year in which the participant retires, the participant must annually make a required minimum distribution (RMD). The RMD rules do not apply to calendar year 2020 as a result of the enactment of the CARES Act on March 27, 2020.

Loans

Effective October 1, 2011, participants may borrow from their accounts a minimum of $1,000 up to a maximum equal to the lesser of (1) $50,000 reduced by the excess (if any) of the highest outstanding balances of loans from the Plan to the participant during the one year period ending on the day before the date on which such loan is made, over the outstanding balance of loans from the Plan to the participant on the date on which such loan was made, or (2) 50% of the present value of the non-refundable accrued benefit of the participant under the Plan. However, under Section 2202 of the CARES Act, enacted on March 27, 2020, participants may borrow up to the lesser of $75,000 or 100% of the qualified participant's account balance in the plan for loans made from March 27, 2020 to September 22, 2020.

The loans are secured by the balance in the participant's account and must be repaid over a maximum period of 60 months for general purposes and 180 months for a home purchase. Loans bear interest at a fixed rate equal to the U.S. prime rate for general purpose loans and FHA/VA rate on home purchase loans. The interest rates on general purpose loans were 3.25% and 5.25% at September 30, 2020 and 2019, respectively. The interest rates on home purchase loans were 2.875% and 4.504% at September 2020 and 2019, respectively. However, under Section 2202 of the CARES Act, enacted on March 27, 2020, participants with loans outstanding on or after

NOTE 1 - DESCRIPTION OF PLAN (Continued)

March 27, 2020, and any payment on the loan is due from March 27, 2020 to December 31, 2020, that due date may be delayed under the Plan for up to one year.

Plan Membership
At September 30, 2020 and 2019, the Plan's membership consisted of the following:

	2020	2019
Active Members	19,386	17,007
Inactive Members	6,764	6,115
	26,150	23,122

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Presentation
The Plan's financial statements have been prepared in accordance with accounting principles generally accepted in the United States of America (GAAP) as prescribed by the Governmental Accounting Standards Board (GASB), which requires two basic financial statements: statement of fiduciary net position and statement of changes in fiduciary net position. For financial reporting purposes, the Plan is considered a pension trust fund.

Basis of Accounting
The financial statements of the Plan are prepared under the accrual basis of accounting. Employee contributions are recognized by the Plan at the time compensation is earned by Plan members and the payments become due from the District government. Investment income is recognized when earned. Deductions are recognized when due and payable in accordance with the terms of the Plan.

Investment Valuation
At September 30, 2020 and 2019, the Plan's investments were in mutual funds, a stable value fund, and brokerage accounts. Shares in mutual funds and the brokerage accounts are reported at fair value based on quoted market prices, which represent the net asset value of shares held by the Plan at fiscal year-end. Investments in the stable value fund are presented at contract value, which approximates fair value. Contributions of participants who elect this investment option are combined and held in trust. The Plan has an undivided interest in the trust and its ownership is represented by its proportionate dollar interest.

Purchases and sales of securities are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date. Net appreciation (depreciation) includes the Plan's gains and losses on investments bought and sold as well as held during the year.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Fair Value Measurements

The Plan categorizes fair value measurements within the fair value hierarchy established by GASB Statement No. 72, *Fair Value Measurement and Application*.

The valuation technique uses a three-level hierarchy of inputs to measure the fair value of the asset and gives the highest priority to unadjusted quoted prices in active markets (level 1 measurements) and the lowest priority to unobservable inputs (level 3 measurements). These classifications are summarized as follows:

> Level 1 Inputs: Quoted prices (unadjusted) for identical assets or liabilities in active markets that a reporting entity can access at the measurement date.
>
> Level 2 Inputs: Inputs other than quoted prices included within Level 1 that are observable for an asset or liability, either directly or indirectly.
>
> Level 3 Inputs: Unobservable inputs for an asset or liability

In the event that inputs used to measure the fair value of an asset or liability fall into different levels in the fair value hierarchy, the overall level of the fair value hierarchy in its entirety is determined based on the lowest level input that is significant to the entire valuation. These levels are not necessarily an indication of risk but are based upon the pricing transparency of the investment.

Fair value of certain investments that do not have a readily determinable fair value is established using net asset value (or its equivalent) as a practical expedient. These investments are not categorized according to the fair value hierarchy.

Notes Receivable from Participants

Loans to participants are recorded at principal less repayments and plus accrued interest. The loan balance reflected in the Statement of Fiduciary Net Position is also adjusted for defaulted loans. If a payment is missed for any reason, the loan is considered delinquent and in arrears. All missed payments should be made by the end of the next calendar quarter. A loan is considered in default and taxed as a “deemed distribution” if missed payments are not made during the applicable grace period. Even after a loan is deemed distributed, loan repayments will continue to be deducted from available compensation until the earlier of when the loan is paid or the maturity date is reached. Employees who leave District employment may continue to repay the loan by making alternative payment arrangements. As of September 30, 2020, and 2019, the total of all defaulted loans was $1,420,120 and $1,753,621, respectively.

NOTE 2 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Employee Contributions
Employee contributions are recognized as revenue at the time compensation is earned by Plan members on a specified payroll pay date or when received from other eligible plans.

Payment of Benefits
Benefit payments are recorded as deductions when due for payment.

Use of Estimates
The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Tax Status
The Plan is an eligible employee deferred compensation plan under Section 457(b) of the Internal Revenue Code.

NOTE 3 - INVESTMENTS

Investments of the Plan at September 30, 2020 and 2019 consist of the following:

	2020	2019
Stock and Bond Funds	$ 686,074,903	$ 620,159,702
Stable Value Fund	257,797,242	246,335,190
Self-Directed Brokerage Account	9,572,678	6,173,354
Total Investments	$ 953,444,823	$ 872,668,246

NOTE 3 – INVESTMENTS (Continued)

The Plan's investments in Registered Investment Companies are stated at fair market value. The stable value fund is recorded at contract value, which approximates fair value. The Plan's investments are subject to the following risks common to investments:

- *Custodial credit risk* is the risk that the Plan will not be able to recover the value of its investments in the event of a failure by the counterparty to a transaction. Investments are exposed if they are uninsured, are not registered in the name of the Plan, and are held by either (a) the counterparty or (b) the counterparty's trust department or agent, but not in the Plan's name. The Plan's investments for fiscal years 2020 and 2019 are partially insured and registered in the Plan's name and are generally segregated by the counterparty in a manner to protect them from certain claims by creditors. The Plan also invests in mutual and commingled trust funds which are not generally exposed to custodial credit risks. The Plan Sponsor performs periodic qualitative assessments of the investment managers and investment strategy to minimize custodial credit risk.

- *Interest rate risk* is the risk that changes in interest rates will adversely affect the fair value of an investment. The Plan manages its exposure to declines in fair values by not offering investments that have excessive average maturities. The following discloses the weighted average maturity for certain mutual funds that include investments in bonds at September 30, 2020.

Investment	Average Maturity
Vantagepoint Plus Fund	3.06 years
DCPLUS Fixed Income Portfolio	8.50 years
PIMCO Real Return Collective Trust II	8.42 years

- *Foreign currency risk* is the risk that changes in exchange rates will adversely affect the fair value of an investment in a foreign financial institution. The Plan mitigates this risk by limiting its investments in any one country to no more than the greater of either 25% of the equity portion of the investment account or by the country's weight in the Europe, Australia, and Far East (EAFE) benchmark. In addition, a minimum of eight countries must be represented in each investment account. As a result, the Plan's currency denomination varies.

NOTE 3 - INVESTMENTS (Continued)

At September 30, 2020 and 2019, the investment with the largest foreign currency risk is the Harbor International Fund. The major currency denomination for the Harbor International Fund is the Yen.

- *Credit risk* is the risk that an issuer to an investment will not fulfill its obligations. The Plan does not invest in securities that have an overall quality less than BBB as rated by Moody's or Standard & Poors. There were 15 out of 31 investments that had credit ratings in fiscal year 2020 and 15 out of 30 that had a credit rating in fiscal year 2019. At September 30, 2020 and 2019, those investments and the related credit ratings were as follows:

September 30, 2020

Fund	Credit Ratings
DCPLUS Fixed Income Portfolio	AAA/BBB/A/AA/BB
Vantagepoint Plus Fund	AAA/AA/A/BBB/BBB-
Vanguard Target Retirement Income	AAA/BBB/A/AA
Vanguard Target Retirement 2015	AAA/BBB/A/AA
Vanguard Target Retirement 2020	AAA/BBB/A/AA
Vanguard Target Retirement 2025	AAA/BBB/A/AA
Vanguard Target Retirement 2030	AAA/BBB/A/AA
Vanguard Target Retirement 2035	AAA/BBB/A/AA
Vanguard Target Retirement 2040	AAA/BBB/A/AA
Vanguard Target Retirement 2045	AAA/BBB/A/AA
Vanguard Target Retirement 2050	AAA/BBB/A/AA
Vanguard Target Retirement 2055	AAA/BBB/A/AA
Vanguard Target Retirement 2060	AAA/BBB/A/AA
Vanguard Target Retirement 2065	AAA/BBB/A/AA
PIMCO Real Return Collective Trust II	AAA/A

NOTE 3 - INVESTMENTS (Continued)

September 30, 2019

Fund	Credit Ratings
DCPLUS Fixed Income Portfolio	AAA/BBB/A/AA
Vantage Trust Plus Fund	AAA/AA/A/BBB/BBB-
Vanguard Target Retirement Income	AAA/BBB/A/AA
Vanguard Target Retirement 2015	AAA/BBB/A/AA
Vanguard Target Retirement 2020	AAA/BBB/A/AA
Vanguard Target Retirement 2025	AAA/BBB/A/AA
Vanguard Target Retirement 2030	AAA/BBB/A/AA
Vanguard Target Retirement 2035	AAA/BBB/A/AA
Vanguard Target Retirement 2040	AAA/BBB/A/AA
Vanguard Target Retirement 2045	AAA/BBB/A/AA
Vanguard Target Retirement 2050	AAA/BBB/A/AA
Vanguard Target Retirement 2055	AAA/BBB/A/AA
Vanguard Target Retirement 2060	AAA/BBB/A/AA
Vanguard Target Retirement 2065	AAA/BBB/A/AA
PIMCO Real Return Collective Trust II	AAA/AA/A

Investment concentrations - In accordance with GASB Statement No. 25, *Financial Reporting for Defined Benefit Pension Plans and Note Disclosures for Defined Contribution Plans as amended by Government Accounting Standards Board Statement No. 40 (GASB 40), Deposit and Investment Risk Disclosures – An amendment of GASB Statement No. 3*, the Plan is required to disclose the identification, by amount and issuer, of investments in any one issuer that represent 5% or more of the Plan's net position. Investments issued or explicitly guaranteed by the U.S. government and investments in mutual funds, external investment pools, and other pooled investments are excluded from this requirement.

The funds that meet the 5% or more disclosure criteria discussed above are: Vantagepoint Plus Fund (27.1%), Vanguard Institutional Index Fund (11.0%), DCPLUS Large Cap Value Portfolio (8.3%), Ariel Institutional (6.0%) and the DCPLUS Large Cap Growth Portfolio (5.0%).

NOTE 4 - FAIR VALUE MEASUREMENTS

The Plan categorizes fair value measurements within the fair value hierarchy established by generally accepted accounting principles. The Plan had the following fair value measurement as of September 30, 2020:

		Fair Value Measurements Using		
	Total	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Investments measured at fair value:				
Equities				
Materials	$ 18,934,122	$ 18,934,122	$ -	$ -
Consumer and Cyclical and Defensive	103,692,685	103,692,685	-	-
Financial Services	82,505,464	82,505,464	-	-
Real Estate	32,412,876	32,412,876	-	-
Communication Services	62,469,582	62,469,582	-	-
Energy	22,235,242	22,235,242	-	-
Industrials	64,696,712	64,696,712	-	-
Technology	123,913,907	123,913,907	-	-
Healthcare	91,263,986	91,263,986	-	-
Utilities	21,286,651	21,286,651	-	-
Debt securities				-
Government	19,256,837	19,256,837	-	-
Corporate	10,881,432	10,881,432	-	-
Securitized	10,728,140	10,728,140	-	-
Municipal	1,720,623	1,720,623	-	-
Other	998,678	998,678	-	-
Other funds	28,039,432	28,039,432	-	-
Total investments measured at fair value	$ 695,036,369	$ 695,036,369	$ -	$ -
Investments measured at cost:				
Cash	611,212			
Investments measured at contract value:				
Stable Value Fund	257,797,242			
Total Investments	$ 953,444,823			

NOTE 4 - FAIR VALUE MEASUREMENTS (Continued)

The Plan has the following fair value measurement as of September 30, 2019:

		Fair Value Measurements Using		
	Total	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Investments measured at fair value:				
Equities				
Materials	$ 21,548,285	$ 21,548,285	$ -	$ -
Consumer and Cyclical and Defensive	114,319,202	114,319,202	-	-
Financial Services	94,011,939	94,011,939	-	-
Real Estate	31,779,165	31,779,165	-	-
Communication Services	15,298,353	15,298,353	-	-
Energy	27,443,789	27,443,789	-	-
Industrials	67,679,246	67,679,246	-	-
Technology	114,025,941	114,025,941	-	-
Healthcare	69,922,924	69,922,924	-	-
Utilities	18,508,029	18,508,029	-	-
Debt securities				-
Government	14,859,792	14,859,792	-	-
Corporate	8,631,781	8,631,781	-	-
Securitized	8,617,896	8,617,896	-	-
Municipal	923,266	923,266	-	-
Other	923,266	923,266	-	-
Other funds	17,460,775	17,460,775	-	-
Total investments measured at fair value	625,953,649	$ 625,953,649	$ -	$ -
Investments measured at cost:				
Cash	379,407			
Investments measured at contract value:				
Stable Value Fund	246,335,190			
Total Investments	$ 872,668,246			

NOTE 5 - LIFE INSURANCE POLICIES

Prior to fiscal year 2000, the Plan offered participants an investment option to purchase life insurance policies underwritten by life insurance companies. Although the life insurance policies are no longer available to participants as an investment option, participants with existing life insurance policies are permitted to continue their contribution to those policies. As of September 30, 2020, and 2019, the contract values of participants' life insurance policies have been excluded from Plan's assets because the life insurance companies assume the obligations to pay the benefits under the policies. Monumental and Shenandoah Life Insurance Companies underwrite existing policies. Participants' life insurance contract values for the years ended September 30, 2020 and 2019, totaled $3,705,727 and $3,897,335, respectively.

NOTE 6 - PLAN FEES

Fees are charged to participants' accounts for investment management services and administrative expenses of the Plan. The investment management fees vary by investment fund and are calculated based on the fund's daily asset value. For the years ended September 30, 2020 and 2019, investment management fees totaled $3,903,844 and $3,791,040, respectively. The Program Manager receives a net administrative fee of 0.165% (16.5 basis points) of the Plan's daily asset value. For the years ended September 30, 2020 and 2019, Program Manager administrative fees totaled $1,226,437 and $1,119,210, respectively.

NOTE 7 - DUE TO DISTRICT GOVERNMENT

Per the contract agreement, the Program Manager annually reimburses the Plan Administrator 5.5 basis points. The reimbursement is accumulated in an administrative reimbursement account held by the Program Manager and is used annually by the District to pay for direct administrative expenses incurred and for contributions toward salaries expenses incurred by the District and the Plan Administrator. Additions to and deductions from the administrative reimbursement account are not Plan transactions reflected in the Statements of Changes in Fiduciary Net Position.

After recognizing the basis point reimbursement, interest earnings and payments from the administrative reimbursement account, the balance in the administrative reimbursement account as of September 30, 2020 and 2019 was $773,364 and $499,875, respectively. This is recorded in the Statement of Fiduciary Net Position as "Due to District Government". The amount owed from the Program Manager as of September 30, 2020 and 2019 was $31,769 and $29,526, respectively.

NOTE 8 - ADMINISTRATIVE EXPENSES

The Plan does not directly incur administrative expenses. Administrative expenses are incurred by the Plan Administrator and the Program Manager for the operation of the Plan.

The amount recorded as administrative expenses in the Statement of Changes in Fiduciary Net Position of $368,361 and $342,743 for fiscal years 2020 and 2019, respectively, represents the Program Manager's investment expenses allocation towards administrative expenses.

The administrative expenses incurred by the Plan Administrator and reimbursed from the administrative reimbursement account (see Note 7) for the years ended September 30, 2020 and 2019 totaled $172,506 and $289,131, respectively, and were as follows:

	2020	**2019**
Audit and Compilation Services	$ 150,300	$ 96,133
Investment Consulting Services	22,206	60,298
District Administrative Reimbursement	-	126,850
Other Expenses	-	5,850
	$ 172,506	$ 289,131

For fiscal years 2020 and 2019, the Plan assessed $75 for each new participant loan processed and $50 per participant for existing loans. Loan fees totaled $413,890 and $402,609 in fiscal years 2020 and 2019, respectively.

NOTE 9 - TERMINATED PARTICIPANTS

As of September 30, 2020, and 2019, the Plan had 6,764 and 5,960 terminated participants, respectively, who have account balances in the Plan. The participants are no longer able to contribute to the Plan, but their account balances are adjusted for fees and investment earnings. The value of the account balances as of September 30, 2020 and 2019 totaled $267,706,953 and $215,808,618, respectively.

NOTE 10 - PLAN TERMINATION

The District may amend or terminate this Plan provided that such amendment or termination shall not impair the rights of a vested participant or beneficiary to receive any contributions, and income earned thereon, allocated to his or her active or inactive account, as the case may be, prior to the date of the termination or amendment of the Plan.

NOTE 11 - RISKS AND UNCERTAINTIES

The Plan invests in investment securities that are exposed to various risks such as interest rate, market, and credit risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible, that changes in the values of the investment securities will occur in the near term and, that such changes could materially affect participants' account balances and the amounts reported in the statements of fiduciary net position.

NOTE 12 - SUBSEQUENT EVENTS

The Plan evaluated subsequent events through December 17, 2020 the date the financial statements were available to be issued. Events or transactions occurring after September 30, 2020, but prior to December 17, 2020, that provided additional evidence about conditions that existed September 30, 2020, have been recognized in the financial statements for the year ended September 30, 2020. Events or transactions that provided evidence about conditions that did not exist as of September 30, 2020 but arose before the financial statements were available to be issued have not been recognized in the financial statements for the year ended September 30, 2020.

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INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*

Office of Finance and Treasury
Office of the Chief Financial Officer
Government of the District of Columbia

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 financial statements of the Government of the District of Columbia 457(b) Deferred Compensation Plan (the "Plan"), as of and for the year ended September 30, 2020, and the related notes to the financial statements, which collectively comprise the Plan's basic financial statements, and have issued our report thereon dated December 17, 2020.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Plan's internal control over financial reporting (internal control) 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 Plan's internal control. Accordingly, we do not express an opinion on the effectiveness of the Plan'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 a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Plan'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 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 Plan'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 control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Plan'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 Plan's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

F. S. Taylor & Associates, P.C.

December 17, 2020
Washington, D.C.