Delaware Public Employees'
Retirement System
County & Municipal
Police and Firefighters'
Pension Plan

Schedule of Employer Allocations and Schedule of Pension Amounts by Employer June 30, 2020



# Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan Contents

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Tel: 302-656-5500 Fax: 302-656-8024 www.bdo.com

#### **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 County & Municipal Police and Firefighters' Pension Plan as of and for the year ended June 30, 2020, and the related notes. We have also audited the total for all entities of the columns titled net pension liability, total deferred outflows of resources, total deferred inflows of resources, and total pension expense excluding that attributable to employer-paid member contributions (specified column totals) included in the accompanying schedule of pension amounts by employer of the County & Municipal Police and Firefighters' Pension Plan as of and for the year ended June 30, 2020, 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 pension 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 pension 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 pension amounts by employer. The procedures selected depend on the auditors' judgement, including the assessment of the risks of material misstatement of the schedule of employer allocations and specified column totals included in the schedule of pension amounts by employer, whether due to fraud or error. In making those risks 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 pension 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 pension 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 pension liability, total deferred outflows of resources, total deferred inflows of resources, and total pension expense excluding that attributable to employer-paid member contributions for the total of all participating entities for the County & Municipal Police and Firefighters' Pension Plan as of and for the year ended June 30, 2020 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 Delaware Public Employees' Retirement System, which include the County & Municipal Police and Firefighters' Pension Plan, as of and for the year ended June 30, 2020, and our report thereon, dated November 17, 2020, 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, County & Municipal Police and Firefighters' Pension Plan 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 21, 2021 on our consideration of the County & Municipal Police and Firefighters' Pension Plan'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 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 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 County & Municipal Police and Firefighters' Pension Plan's internal control over financial reporting and compliance.

May 21, 2021

BDO USA, LLP

### Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan Schedule of Employer Allocations

As of and for the year ended June 30, 2020

Employer	Employer contributions	Employer's proportionate share
Bethany Beach	\$ 123,219	0.8025%
Blades	18,540	0.1207
Bridgeville	63,238	0.4119
Camden	79,008	0.5146
Cheswold	39,135	0.2549
Christiana Fire	131,931	0.8592
Clayton	100,830	0.6567
Dagsboro	31,914	0.2078
Delmar Police	120,206	0.7829
Dewey Beach	67,219	0.4378
Dover	1,306,938	8.5117
Elsmere Police	78,198	0.5093
Felton Police	37,526	0.2444
Fenwick Island	68,736	0.4477
Georgetown	223,266	1.4541
Greenwood	26,621	0.1734
Harrington Police	112,538	0.7329
Laurel Police	175,326	1.1419
Lewes Police	135,097	0.8799
Middletown Police	463,142	3.0161
Milford	406,199	2.6455
Millsboro	164,941	1.0742
Milton	56,495	0.3679
New Castle City	184,064	1.1988
New Castle County Police	4,900,686	31.9168
Newport	79,371	0.5169
Ocean View	125,426	0.8169
Rehoboth Beach Police	207,821	1.3535
Seaford Police	286,467	1.8657
Selbyville Police	81,684	0.5320
Smyrna Police	239,425	1.5593
South Bethany	54,600	0.3556
Wilmington Pol/FF	5,142,823	33.4938
Wyoming	21,916	0.1427
Total	\$ 15,354,546	100.00%

See accompanying notes to Schedule of Employer Allocations and Schedule of Pension Amounts by Employer.

### Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan Schedule of Pension Amounts by Employer As of and for the year ended June 30, 2020

Pension expense excluding that attributable to employer-paid

Part					56 1 16									table to employer-paid	
Part					Deferred outf	low of resource	'S		Deferre	d inflows of reso	urces		me	mber contributions	
Part										Net Difference					
Part															Total pension
Part										projected and					expense
Employer   Part   Par				Differences				Differences		actual					excluding that
Employer				between				between		investment		Total		Net amortization of	attributable to
Engloyer								expected and							
Bethany Peach   \$ 123,239   122,706   45,535   3,740   171,981   38,860   18,631   87,438   5,529   151,458   121,574   (740)   120,834   Biddes   18,557   18,557   18,637   6,651   779   26,903   5,147   2,803   13,156   6,446   22,522   18,292   (799)   17,313   Bridgerille   61,955   62,975   22,369   3,480   89,824   19,943   9,562   44,875   4,287   73,667   62,394   (152)   62,242   62,666   79,079   71,734   76,242   77,953   1,734   76,249   62,666   79,079   71,734   76,249   62,666   79,079   71,734   76,249   62,666   79,244   102,482   77,953   1,734   76,249   62,666   77,970   71,744   72,649		1													
Blades' 18,557 18,463 6,851 779 26,093 5,847 2,803 13,156 6,446 28,222 18,292 (979) 17,313 gridgeville 63,295 62,975 23,369 3,480 89,824 19,943 9,552 44,875 4,287 78,667 62,394 (152) 62,242 Canden 79,079 78,679 29,197 1,001 108,877 24,917 11,946 56,065 9,524 102,452 77,953 (1,734) 76,219 (1,731) 1,001 108,877 24,917 11,946 56,065 9,524 102,452 77,953 (1,734) 76,219 (1,731) 1,001 108,877 24,917 11,946 10,001 10,0															
Bridgeville 63,295 62,975 23,369 3,480 89,824 19,943 9,562 44,875 4,287 78,667 62,394 (152) 62,242 (27,64) (152) 62,242 (27,64) (152) 62,242 (27,64) (152) 62,242 (27,76) (154) 64,642 (154		Ş													
Canden   79,079   78,679   29,197   1,001   108,877   24,917   11,946   56,065   9,524   102,452   77,953   (1,734)   76,219   (1,734)															
Chewold         39,170         38,972         14,462         6,870         60,304         12,342         5,917         27,771         412         46,442         38,612         1,011         39,623         Clayton         100,921         100,411         37,262         42,1811         41,607         19,949         36,202         155,766         130,169         7,99         13,788           Clayton         100,921         100,411         37,262         4,235         141,908         31,799         15,246         71,551         4,236         122,832         99,484         (40)         99,444           Dewey Beach         67,280         66,931         41,422         1,180         165,308         37,910         18,176         85,300         10,636         152,022         118,601         (1,785)         116,816           Dewey Beach         67,280         66,932         74         27,965         1,812,436         412,171         197,617         927,422         63,659         1,600,669         1,288,487         (9,055)         1,280,422         Elsmere Police         73,500         37,370         13,888         2,688         53,924         1,181,41         14,661         112,471         197,617         927,422         63,659         1,600,66															
Christiana Fire 132,049 131,382 48,755 61,674 241,811 41,607 19,949 93,620 - 155,176 130,169 7,709 137,878 (Layton 100,921 100,411 37,262 4,235 141,908 31,799 15,246 77,551 4,226 122,832 99,448 (40) 99,480 pagshoro 31,942 31,781 11,794 1,970 45,545 10,065 4,826 22,647 2,796 40,334 31,488 (45) 31,448 (45) 13,443 pagshoro 120,314 119,706 44,422 1,180 165,308 37,910 18,176 88,300 10,636 152,022 118,601 (1,785) 116,816 pewg Pach 67,280 66,939 24,841 839 92,619 21,199 10,164 47,700 12,655 91,718 66,322 (1,771) 64,605 pewg Pach 78,268 77,872 28,898 38,44 110,614 24,661 11,824 55,490 10,843 102,818 77,154 (1,509) 75,645 permethice 375,688 77,872 28,898 38,44 110,614 24,661 11,824 55,490 10,843 102,818 77,154 (1,509) 75,645 permethice 375,568 67,988 223,485 10,933 48,776 34,822 84,279 67,819 (309) 67,510 permethic 48,400 pags 223,466 222,337 82,507 12,286 317,130 70,412 33,759 158,433 5,344 26,798 220,285 1,279 24,164 pags 2															
Clayton 100,921 100,411 37,262 4,235 141,908 31,799 15,246 71,551 4,236 122,832 99,484 (40) 99,444 Dagsboro 31,942 31,781 11,794 1,970 44,422 1,180 165,308 37,910 18,176 85,300 10,636 152,022 118,601 (1,785) 116,816 16,922 (1,787) 16,465 16,922 119,910 16,465 17,826 18,921 19,910 1,914 47,700 12,655 91,718 66,322 (1,787) 16,465 18,601 19,301,497 482,974 27,965 1,812,436 412,171 197,617 927,422 63,659 1,600,869 1,289,487 (9,065) 1,280,422 18,1801 10,181											412				
Dagsboro         31,942         31,781         11,794         1,970         45,545         10,065         4,826         22,647         2,796         40,334         31,488         (45)         31,448           Debmar Police         120,314         119,706         44,422         1,180         165,308         37,910         18,176         85,300         10,636         152,022         118,601         (1,785)         116,816           Dover         1,308,109         1,301,497         482,974         27,965         1,119         10,164         47,700         12,655         91,718         66,322         (1,171)         64,605           Elsmer Police         78,268         77,872         28,888         3,844         110,614         24,661         11,824         55,490         10,843         102,818         77,154         (1,509)         75,645           Femwick Island         68,798         68,650         22,401         2,700         66,551         21,678         10,393         48,776         3,432         84,779         67,819         309         67,510           Georgetown         223,466         222,343         32,501         12,700         66,551         12,582         3,541         17,016         49,252 <td< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>4 224</td><td></td><td></td><td></td><td></td></td<>											4 224				
Delmar Police 120, 314 119, 706 44, 422 1, 180 165, 308 37, 910 18, 176 85, 300 10, 636 152, 022 118, 601 (1, 785) 116, 816 Dewey Beach 6, 72, 820 66, 939 24, 884 839 92, 619 12, 1819 10, 164 47, 700 12, 655 91, 718 66, 322 (1, 717) 64, 605 50 power 1, 308, 109 1, 301, 497 482, 974 27, 965 1, 1812, 436 412, 171 197, 617 927, 422 63, 659 1, 600, 869 1, 289, 487 (19, 605) 1, 280, 422 181, 610 10, 610 11, 824 11, 824 11, 610 11, 824 11,															
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Dover 1,308,109 1,301,497 482,974 27,965 1,812,436 412,171 197,617 927,422 63,659 1,600,869 1,289,487 (9,065) 1,280,422   Elsmere Police 78,268 77,572 28,898 3,844 110,44 24,661 11,824 55,409 10,843 102,818 77,154 11,509) 75,645   Felton Police 37,500 37,370 13,868 2,688 53,926 11,835 5,674 26,629 3,689 47,827 37,025 (333) 36,672   Fenwick Island 68,798 68,450 25,401 2,700 96,551 21,678 10,393 48,776 3,432 84,279 67,819 (309) 67,510   Georgetown 223,466 222,337 82,507 12,286 317,130 70,412 33,759 158,433 5,394 267,998 220,285 12,79 221,554   Greenwood 26,645 26,511 9,838 624 36,973 8,396 4,025 18,891 3,811 35,123 26,266 13,479 221,554   Haurel Police 112,639 112,070 41,588 2,162 155,820 35,491 17,016 79,859 1,508 133,874 111,036 172 111,208   Laurel Police 135,218 134,535 49,925 2,818 187,278 42,606 20,428 95,867 6,426 115,327 133,293 (573) 132,720   Mildord 406,553 404,508 150,109 13,332 587,949 128,104 61,420 288,245 17,152 404,921 400,775 298 401,073   Millisbror 165,337 165,339 146,256 60,592 19,266 224,473 52,018 24,940 11,045 3,398 17,401 10,273 1,951 10,449   New Castle City 184,229 185,298 68,023 1,811,032 70,162 676,487 15,455,411 71,015 3,398 177,401 10,273 1,951 10,490   New Castle City 179,442 79,441 29,331 567 106,399 25,001 12,001 56,323 12,004 10,598 78,311 (1,806) 76,503   Newport 79,442 79,041 29,331 567 106,399 25,001 12,001 56,323 12,244 181,059 44,852,57 (8,222) 8,245 10,104 148,200   New Castle County 4,905,868 4,880,293 1,811,032 70,162 6,761,487 15,455,411 741,013 3,477,63 12,244 11,045 13,398 78,311 (1,806) 76,503   Newport 79,442 79,041 29,331 567 106,399 25,001 12,001 56,323 12,244 181,040 74,582 186,100 76,503   Newport 79,442 79,041 29,331 567 106,399 25,001 12,001 56,323 12,244 181,040 74,582 186,100 76,503   Newport 79,442 79,041 29,331 567 106,399 25,001 12,001 56,323 12,244 181,040 74,582 186,100 76,503   Newport 79,442 79,041 29,331 567 106,399 25,001 12,001 56,323 12,244 181,040 74,582 186,100 76,503   Newport 79,442 79,444 29,331 13,145 121,661 125,761 12,351 13,462 147,473 14															
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Harrington Police 112,639 112,070 41,588 2,162 155,820 35,491 17,016 79,859 1,508 133,874 111,036 172 1111,208 Laurel Police 175,484 174,596 64,791 16,039 255,426 55,293 26,510 124,414 1,188 207,405 172,985 2,063 175,048 187,278 42,606 20,428 95,867 6,426 165,327 133,293 (573) 132,720 Middletown Police 463,558 461,215 171,153 36,461 668,829 146,062 70,030 328,653 15,980 560,725 456,959 1,041 458,000 Miltord 406,563 404,508 150,109 33,332 587,949 128,104 61,420 288,245 17,152 494,921 400,775 298 401,073 Millsboro 165,089 164,255 60,952 19,266 244,473 52,018 24,940 117,045 3,398 197,401 162,739 1,951 164,690 Miltord 56,545 56,259 20,877 1,298 78,434 17,817 8,542 40,089 23,039 89,487 55,740 (3,936) 51,804 New Castle City 184,229 183,298 68,020 30,287 281,605 58,049 27,832 130,615 17,958 234,454 181,607 4,582 186,189 New Castle County 4,905,086 4,880,293 1,811,032 70,162 6,761,487 1,545,541 741,013 3,477,604 169,138 5,933,296 4,835,257 (8,222) 4,827,035 Newport 79,442 79,041 29,331 567 108,939 25,031 12,001 56,323 12,643 105,998 78,311 (1,806) 76,505 Cecan View 125,539 124,904 46,351 16,316 187,571 39,556 18,965 89,004 1,221 148,746 123,751 2,080 125,831 Rehoboth Beach 208,008 206,956 76,800 2,988 286,744 65,541 31,444 147,473 8,466 252,904 205,047 (667) 204,380 Seaford Police 286,726 285,275 105,863 50,645 441,783 90,343 43,316 203,828 607,13 39,658 18,959 33 371 80,964 500th Beach 219,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 238,429 60,938 238,439 142,400 12,531 12,641 12,351 57,964 4,237 100,313 80,593 371 80,964 500th Beach 219,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 238,429 6,098 242,327 500th Bethamy 54,649 54,373 20,177 9,800 84,335 17,219 8,256 38,745 19,071 83,291 53,871 (1,631) 52,240 Willmington Pol/FF 5,147,440 5,121,422 1,900,513 105,352 7,127,287 1,621,905 777,626 3,649,428 65,232 6,114,191 5,074,161 9,041 5,083,202 49,091 21,936 21,936 21,825 8,099 736 30,660 6,912 3,314 15,552 4,196 29,974 21,624 (372) 21,624	Georgetown														
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Lewes Police 135,218 134,535 49,925 2,818 187,278 42,606 20,428 95,867 6,426 165,327 133,293 (573) 132,720 Middletown Police 463,558 461,215 171,153 36,461 668,829 146,062 70,030 328,653 15,980 560,725 456,959 1,041 458,000 Milford 406,563 404,508 150,109 33,332 587,949 128,104 61,420 288,245 17,152 494,921 400,775 298 401,075 Millsboro 165,089 164,255 60,952 19,266 244,473 52,018 24,940 117,045 3,398 197,401 162,739 1,951 164,690 Milton 56,545 56,259 20,877 1,298 78,434 17,817 8,542 40,089 23,039 89,487 55,740 (3,936) New Castle City 184,229 183,298 68,020 30,287 281,605 58,049 27,832 130,615 17,958 234,454 181,607 4,582 186,189 New Castle County 4,905,086 4,880,293 1,811,032 70,162 6,761,487 1,545,541 741,013 3,477,604 169,138 5,933,296 4,835,257 (8,222) 4,827,035 Newport 79,442 79,041 29,331 567 108,939 25,031 12,001 56,323 12,643 105,998 78,311 (1,806) 67,505 Ocean View 125,539 124,904 46,351 16,316 187,571 39,556 18,965 89,004 1,221 148,746 123,751 2,080 125,831 Rehoboth Beach 208,008 206,956 76,800 2,988 286,744 65,541 31,424 147,473 8,466 252,904 205,047 (667) 204,380 Seaford Police 286,726 285,275 105,863 50,645 441,783 90,343 43,316 203,282 60,717 397,658 282,643 (1,714) 208,992 Selbyrille Police 31,757 81,344 30,186 10,131 121,661 25,761 12,351 57,964 4,237 100,313 80,593 371 80,964 Smyrna Police 239,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 236,229 6,098 224,237 South Bethamy 54,649 54,373 20,177 9,800 84,350 17,219 8,256 38,745 19,071 83,291 53,871 (1,631) 52,240 Wilmington Pol/FF 5,147,440 5,121,422 1,900,513 105,352 7,127,287 1,621,905 777,626 3,649,428 65,232 6,114,191 5,074,161 9,041 5,083,202 40,061 4															
Middletown Police         463,558         461,215         171,153         36,461         668,829         146,062         70,303         328,653         15,980         560,725         456,959         1,041         458,000           Milford         406,563         404,508         150,109         33,332         587,949         128,104         61,420         288,245         17,152         494,921         400,775         298         401,073           Miltson         165,089         164,255         60,952         19,266         244,473         52,018         24,940         117,045         3,398         197,401         162,739         1,951         164,690           Miltson         56,545         56,259         20,877         1,298         78,434         17,817         8,542         40,089         23,039         89,487         55,740         (3,936)         51,804           New Castle City         184,229         183,298         68,020         30,287         281,605         58,049         27,832         130,615         17,958         234,454         181,607         4,582         186,189           New Castle City         4,995,086         4,880,293         1,811,032         70,162         6761,487         1,545,541         141,013 <td></td>															
Miltord 406,563 404,508 150,109 33,332 587,949 128,104 61,420 288,245 17,152 494,921 400,775 298 401,073 Miltoro 165,089 164,255 60,952 19,266 244,473 52,018 24,940 117,045 3,398 197,401 162,739 1,951 164,690 Nilton 55,6545 56,259 20,877 1,298 78,434 17,817 8,542 40,089 23,039 89,487 55,740 (3,936) 51,804 New Castle City 184,229 183,298 68,020 30,287 281,605 58,049 27,832 130,615 17,958 234,454 181,607 4,582 186,189 New Castle County 4,905,086 4,880,293 1,811,032 70,162 6,761,487 1,545,541 741,013 3,477,604 169,138 5,933,296 4,835,257 (8,222) 4,827,035 Newport 79,442 79,041 29,331 567 108,939 25,031 12,001 56,323 12,643 105,998 78,311 (1,806) 76,505 Ccean View 125,539 124,904 46,351 16,316 187,571 39,556 18,965 89,004 1,221 148,746 123,751 2,080 125,831 Rehoboth Beach 208,008 206,956 76,800 2,988 286,744 65,541 31,424 147,473 8,466 252,904 205,047 (667) 204,380 Seaford Police 286,726 285,275 105,863 50,645 441,783 90,343 43,316 203,282 60,717 397,658 282,643 (1,714) 280,929 Selbyville Police 81,757 81,344 30,186 10,131 121,661 25,761 12,351 57,964 4,237 100,313 80,593 371 80,964 Smyrna Police 239,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 236,229 6,098 242,327 South Bethany 54,649 54,373 20,177 9,800 84,350 17,219 8,256 38,745 19,071 83,291 53,871 (1,631) 52,240 Wilmington Pol/FF 5,147,440 5,121,422 1,900,513 105,352 7,127,287 1,621,905 777,626 3,649,428 65,232 6,114,191 5,074,161 9,041 5,083,202 Myoming 21,936 21,825 8,099 736 30,660 6,912 3,314 15,552 4,196 29,974 21,624 (372) 21,652															
Millsboro 165,089 164,255 60,952 19,266 244,473 52,018 24,940 117,045 3,398 197,401 162,739 1,951 164,690 Milton 56,545 56,259 20,877 1,298 78,434 17,817 8,542 40,089 23,039 89,487 55,740 (3,936) 51,804 New Castle City 184,229 183,298 68,020 30,287 281,605 58,049 27,832 130,615 17,958 234,454 181,607 4,582 186,189 New Castle County 4,905,086 4,880,293 1,811,032 70,162 6,761,487 1,545,541 741,013 3,477,604 169,138 5,933,296 4,835,257 (8,222) 4,827,035 Newport 79,442 79,041 29,331 567 108,939 25,031 12,001 56,323 12,643 105,998 78,311 (1,806) 76,505 Ocean View 125,539 124,904 46,351 16,316 187,571 39,556 18,965 89,004 1,221 148,746 123,751 2,080 125,831 Rehoboth Beach 208,008 206,956 76,800 2,988 286,744 65,541 31,424 147,473 8,466 252,904 205,047 (667) 204,380 Seaford Police 286,726 285,275 105,863 50,645 441,783 90,343 43,316 203,282 60,717 397,658 282,643 (1,714) 280,929 Selbyrille Police 81,757 81,344 30,186 10,131 121,661 25,761 12,351 57,964 4,237 100,313 80,593 371 80,964 Smyrna Police 239,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 236,229 6,098 242,327 South Bethany 54,649 54,373 20,177 9,800 84,350 17,219 8,256 38,745 19,071 83,291 53,871 (1,631) 52,240 Wilmington Pol/FF 5,147,440 5,121,422 1,900,513 105,352 7,127,287 1,621,905 77,626 3,649,428 65,232 6,114,191 5,074,161 9,041 5,083,202 Wyoming 21,936 21,825 8,099 736 30,660 6,912 3,314 15,552 4,196 29,974 21,624 (372) 21,252															
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Newport 79,442 79,041 29,331 567 108,939 25,031 12,001 56,323 12,643 105,998 78,311 (1,806) 76,505 Ocean View 125,539 124,904 46,351 16,316 187,571 39,556 18,965 89,004 1,221 148,746 123,751 2,080 125,831 Rehoboth Beach 208,008 206,956 76,800 2,988 286,744 65,541 31,424 147,473 8,466 252,904 205,047 (667) 204,380 Seaford Police 286,726 285,275 105,863 50,645 441,783 90,343 43,316 203,282 60,717 397,658 282,643 (1,714) 280,929 Selbyville Police 81,757 81,344 30,186 10,131 121,661 25,761 12,351 57,964 4,237 100,313 80,593 371 80,964 Smyrma Police 239,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 236,229 6,098 242,327 South Bethany 54,649 54,373 20,177 9,800 84,350 17,219 8,256 38,745 19,071 83,291 53,871 (1,631) 52,240 Wilmington Pol/FF 5,147,440 5,121,422 1,900,513 105,352 7,127,287 1,621,905 777,626 3,649,428 65,232 6,114,191 5,074,161 9,041 5,083,202 Myoming 21,936 21,825 8,099 736 30,660 6,912 3,314 15,552 4,196 29,974 21,624 (372) 21,252															
Ocean View         125,539         124,904         46,351         16,316         187,571         39,556         18,965         89,004         1,221         148,746         123,751         2,080         125,831           Rehoboth Beach         208,008         206,956         76,800         2,988         286,744         65,541         31,424         147,473         8,466         252,904         205,047         (667)         204,380           Seaford Police         286,726         285,275         105,863         50,645         441,783         90,343         43,316         203,282         60,717         397,658         282,643         (1,714)         280,929           Selbyville Police         81,757         81,344         30,186         10,131         121,661         25,761         12,351         57,964         4,237         100,313         80,593         371         80,964           Smyrna Police         239,640         238,428         88,479         48,277         375,184         75,508         36,203         169,900         12,593         294,204         236,229         6,098         242,327           South Bethany         54,649         54,373         20,177         9,800         84,350         17,219         8,256															
Rehoboth Beach 208,008 206,956 76,800 2,988 286,744 65,541 31,424 147,473 8,466 252,904 205,047 (667) 204,380 Seaford Police 286,725 105,863 50,645 441,783 90,343 43,316 203,282 60,717 397,658 282,643 (1,714) 280,929 Selbyrille Police 81,757 81,344 30,186 10,131 121,661 25,761 12,351 57,964 4,237 100,313 80,593 371 80,964 Smyrna Police 239,640 238,428 88,479 48,277 375,184 75,508 36,203 169,900 12,593 294,204 236,229 6,098 242,327 South Bethany 54,649 54,373 20,177 9,800 84,350 17,219 8,256 38,745 19,071 83,291 53,871 (1,631) 52,240 Willington Pol/FF 5,147,440 5,121,422 1,900,513 105,352 7,127,287 1,621,905 777,626 3,649,428 65,232 6,114,191 5,074,161 9,041 5,083,202 Wyoming 21,936 21,825 8,099 736 30,660 6,912 3,314 15,552 4,196 29,974 21,624 (372) 21,252															
Seaford Police         286,726         285,275         105,863         50,645         441,783         90,343         43,316         203,282         60,717         397,658         282,643         (1,714)         280,929           Selbyville Police         81,757         81,344         30,186         10,131         121,661         25,761         12,351         57,964         4,237         100,313         80,593         371         80,964           Smyrna Police         239,640         238,428         88,479         48,277         375,184         75,508         36,203         169,900         12,593         294,204         236,229         6,098         242,327           South Bethany         54,649         54,373         20,177         9,800         84,350         17,219         8,256         38,745         19,071         83,291         53,871         (1,631)         52,240           Wilmington Pol/FF         5,147,440         5,121,422         1,900,513         105,352         7,127,287         1,621,905         777,626         3,649,428         65,232         6,114,191         5,074,161         9,041         5,083,202           Wyoming         21,936         21,825         8,099         736         30,660         6,912															
Selbyville Police         81,757         81,344         30,186         10,131         121,661         25,761         12,351         57,964         4,237         100,313         80,593         371         80,964           Smyrna Police         239,640         238,428         88,479         48,277         375,184         75,508         36,203         169,900         12,593         294,204         236,229         6,098         242,327           South Bethany         54,649         54,373         20,177         9,800         84,350         17,219         8,256         38,745         19,071         83,291         53,871         (1,631)         52,240           Wilmington Pol/FF         5,147,440         5,121,422         1,900,513         105,352         7,127,287         1,621,905         777,626         3,649,428         65,232         6,114,191         5,074,161         9,041         5,083,029           Wyoming         21,936         21,825         8,099         736         30,660         6,912         3,314         15,552         4,196         29,974         21,624         (372)         21,252															
Smyrna Police         239,640         238,428         88,479         48,277         375,184         75,508         36,203         169,900         12,593         294,204         236,229         6,098         242,327           South Bethany         54,649         54,373         20,177         9,800         84,350         17,219         8,256         38,745         19,071         83,291         53,871         (1,631)         52,240           Wilmington Pol/FF         5,147,440         5,121,422         1,900,513         105,352         7,127,287         1,621,905         777,626         3,649,428         65,232         6,114,191         5,074,161         9,041         5,083,202           Wyoming         21,936         21,825         8,099         736         30,660         6,912         3,314         15,552         4,196         29,974         21,624         (372)         21,252														371	
South Bethany         54,649         54,373         20,177         9,800         84,350         17,219         8,256         38,745         19,071         83,291         53,871         (1,631)         52,240           Wilmington Pol/FF         5,147,440         5,121,422         1,900,513         105,352         7,127,287         1,621,905         777,626         3,649,428         65,232         6,114,191         5,074,161         9,041         5,083,202           Wyoming         21,936         21,825         8,099         736         30,660         6,912         3,314         15,552         4,196         29,974         21,624         (372)         21,252															
Wilmington Pol/FF         5,147,440         5,121,422         1,900,513         105,352         7,127,287         1,621,905         777,626         3,649,428         65,232         6,114,191         5,074,161         9,041         5,083,202           Wyoming         21,936         21,825         8,099         736         30,660         6,912         3,314         15,552         4,196         29,974         21,624         (372)         21,252															
Wyoming 21,936 21,825 8,099 736 30,660 6,912 3,314 15,552 4,196 29,974 21,624 (372) 21,252															
Total \$ 15,368,330 15,290,648 5,674,220 592,512 21,557,380 4,842,399 2,321,699 10,895,826 592,512 18,652,436 15,149,546 - 15,149,546															
	Total	\$	15,368,330	15,290,648	5,674,220	592,512	21,557,380	4,842,399	2,321,699	10,895,826	592,512	18,652,436	15,149,546		15,149,546

 $See\ accompanying\ notes\ to\ Schedule\ of\ Employer\ Allocations\ and\ Schedule\ of\ Pension\ Amounts\ by\ Employer.$ 

# Delaware Public Employees' Retirement System

County & Municipal Police and Firefighters' Pension Plan Notes to Schedule of Employer Allocations and Schedule of Pension Amounts by Employer

#### 1. Plan Description

The County & Municipal Police and Firefighters' Pension Plan (the Plan) is a cost sharing multipleemployer defined-benefit pension plan established in the Delaware Code. The Plan is administered by the Delaware Public Employees' Retirement System (DPERS).

The General Assembly is responsible for setting benefits and contributions and amending plan provisions; administrative rules and regulations are adopted and maintained by the Board of Pension Trustees (the Board).

The management of the Plan is the responsibility of the Board. The Board is comprised of five members appointed by the Governor and confirmed by the State Senate, plus two ex-officio members. The daily operation is the responsibility of the Office of Pensions. Although Plan assets are comingled with assets of other Plans and Funds for investment purposes, 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.

The following are brief descriptions of the Plan in effect as of June 30, 2020. For a more complete description, please refer to the DPERS Comprehensive Annual Financial Report.

Separately issued financial statements for DPERS are available from the Office of Pensions at:

McArdle Building, Suite 1 860 Silver Lake Blvd. Dover, DE 19904

#### (a) Plan Description and Eligibility

The plan covers police officers and firefighters employed by a county or municipality of the State that have joined the Plan.

#### (b) Service Benefits

2.5% of final average monthly compensation multiplied by years of credited service up to 20 years, plus 3.5% of final average monthly compensation multiplied by years of service in excess of 20 years. For this plan, final average monthly compensation is the monthly average of the highest three consecutive years of compensation (excluding overtime and special pay).

#### (c) Vesting

Five years of credited service.

#### (d) Retirement

Age 62 with 5 years of service; age plus credited service (but not less than 10 years) equals 75; or 20 years of credited service.

# Delaware Public Employees' Retirement System

County & Municipal Police and Firefighters' Pension Plan Notes to Schedule of Employer Allocations and Schedule of Pension Amounts by Employer

#### (e) Disability benefits

#### **Duty - Total Disability**

75% of final average compensation plus 10% for each dependent not to exceed 25% for all dependents.

#### **Duty - Partial Disability**

Calculated the same as Service Benefits, subject to minimum 50% of final average compensation.

#### **Non-Duty**

Same as Service Benefits, total disability subject to a minimum 50% of final average monthly compensation plus 5% of each dependent not to exceed 20% for all dependents. Partial disability to a minimum of 30% of final average monthly compensation.

#### (f) Survivor Benefits

If employee is receiving a pension, then eligible survivor receives a minimum of 50% of pension; if employee is active, eligible survivor receives 75% of pension the employee would have received at age 62. If the member is killed in the line of duty, the eligible survivor receives 75% of the member's compensation.

#### 2. Basis of Presentation

The Schedules of Employer Allocations and Pension Amounts by Employer (collectively, the Schedules) present amounts that are considered elements of the financial statements of DPERS or its participating employers. Accordingly, they do not purport to be a complete presentation of the financial position or changes in financial position of DPERS or the participating employers. The accompanying schedules have been prepared in conformity with accounting principles generally accepted in the United States of America 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.

#### 3. Allocation Methodology

GASB Statement No. 68, Accounting and Financial Reporting for Pensions, requires participating employers in the Plan to recognize their proportionate share of the collective net pension liability, collective deferred inflows of resources, collective deferred outflows of resources and collective pension expense. The allocation percentages presented in the Schedule of Employer Allocations and applied to the amounts presented in the Schedule of Pension Amounts by Employer are based on the ratio of each employer's contribution to the Plan's total employer contributions during the measurement period July 1, 2019 through June 30, 2020, adjusted to remove contributions to separately finance specific liabilities of an individual employer. Employer contributions to the plan are recognized when due pursuant to legal requirements. The Board of Pension Trustees determines employer contributions. Employer contributions were 16.84% of earnings for the Fiscal Year 2020.

# Delaware Public Employees' Retirement System

County & Municipal Police and Firefighters' Pension Plan
Notes to Schedule of Employer Allocations and
Schedule of Pension Amounts by Employer

#### 4. Collective Net Pension Liability and Actuarial Information

The components of the collective net pension liability of the participating employers at June 30, 2020 were as follows (in thousands):

Employers' total pension liability	\$ 461,752
Plan net position	(446,384)
Employers' net pension liability	\$ 15,368

#### **Actuarial Assumptions**

The collective total pension liability for the June 30, 2020 measurement date was determined by an actuarial valuation as of June 30, 2019, with update procedures used to roll forward the total pension liability to June 30, 2020. This actuarial valuation used the following actuarial assumptions:

#### Actuarial assumptions:

, <u> </u>	
Investment rate of return / discount rate (1)	7.0%
Projected salary increases (1)	2.5% + Merit
Cost of living adjustments	0.0%

<sup>(1)</sup> Inflation is included at 2.5%.

The total pension liabilities are measured based on assumptions pertaining to the interest rates, inflation rates, and employee demographic behavior in future years. 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.

Mortality assumptions are based on the RP-2014 tables with gender adjustments for healthy annuitants and disabled retirees and an adjusted version on MP-2015 mortality improvement scale on a fully generational basis.

Projected benefit payments do not include the effects of projected ad hoc cost of living adjustments (ad hoc COLAs) as they are not substantively automatic. The primary considerations relevant to making this determination include the historical pattern of granting the changes and the consistency in the amounts of the changes.

The long-term expected rate of return on pension 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 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 weighing the expected future real rates of return by an asset allocation percentage, which is based on the nature and mix of current and expected plan investments, and by adding expected inflation.

#### Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan Notes to Schedule of Employer Allocations and

Schedule of Pension Amounts by Employer

Best estimates of geometric real rates of return for each major asset class included in the Plan's current and expected asset allocation as of June 30, 2020 are summarized in the following table:

	Long-term expected	
Asset Class	real rate of return	Asset allocation
Domestic equity	5.7%	28.5%
International equity	5.7	15.2
Fixed income	2.0	28.8
Alternative investments	7.8	23.0
Cash and equivalents	-	4.5

#### Discount Rate

The discount rate used to measure the total pension liability was 7.0%. The projection of cash flows used to determine the discount rate assumed that contributions from plan members will be made at the current contribution rates and that contributions from employers will be made at rates determined by the Board of Pension Trustees, actuarially determined. Based on those assumptions, the pension plans' fiduciary net position was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the total pension liability.

#### Sensitivity of the Collective Net Pension Liability to Changes in the Discount Rate

The following presents the collective net pension liability, calculated using the discount rate of 7.0%, as well as what the collective net pension liability would be if it were calculated using a discount rate that is one percentage point lower or one percentage point higher than the current rate (in thousands):

	1% Decrease	Discount Rate	1% Increase
Collective net pension liability (asset)	\$ 85,541	\$ 15,368	\$ (41,906)

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# Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan Notes to Schedule of Employer Allocations and Schedule of Pension Amounts by Employer

#### 5. Collective Deferred Outflows of Resources and Deferred Inflows of Resources

The following presents a summary of changes in the collective deferred outflows of resources and deferred inflows of resources (excluding employer specific amounts) for the year ended June 30, 2020:

	Measurement period ending June 30	Amortization Period	Beginning of year balance	Additions	Deductions	End of year balance
Deferred Outflows of Reso	urces:					
Difference between expected and actual	2018	10 years	\$ 15,751,843	\$ -	\$ (1,968,980)	\$ 13,782,863
experience	2016	10 years	1,809,341	-	(301,556)	1,507,785
Subtotal			17,561,184	-	(2,270,536)	15,290,648
Changes of assumptions	2017	10 years	6,619,923	-	(945,703)	5,674,220
Subtotal			6,619,923	-	(945,703)	5,674,220
Total			\$ 24,181,107	\$ -	\$ (3,216,239)	\$ 20,964,868
Deferred Inflows of Resour						
Difference between	2020 2019	9 years 1 10 years	\$ - (902,097)	\$ (47,385)	\$ 5,265 100,233	\$ (42,120) (801,864)
expected and actual	2017	10 years	(2,910,163)	-	415,738	(2,494,425)
experience	2015	11 years	(1,804,787)	-	300,797	(1,503,990)
Subtotal			(5,617,047)	(47,385)	822,033	(4,842,399)
Net difference between	2020	5 years	-	(11,434,712)	2,286,942	(9,147,770)
projected and actual	2019	5 years	6,521,497	=	(1,630,374)	4,891,123
earnings on pension	2018	5 years	(6,652,745)	-	2,217,582	(4,435,163)
plan investments	2017 2016	5 years	(4,408,031)	-	2,204,015	(2,204,016)
Subtotal	2016	5 years	4,815,587 276,308	(11,434,712)	(4,815,587) 262,578	(10,895,826)
202000			2.0,000	(,, ., ., ., ., ., ., ., ., ., ., .,		(.0,0,0,020)
Changes of assumptions	2016	10 years	(2,786,039)	-	464,340	(2,321,699)
Subtotal			(2,786,039)	-	464,340	(2,321,699)
Total		!	\$ (8,126,778)	\$ (11,482,097)	\$ 1,548,951	\$ (18,059,924)

(Remainder of page intentionally left blank)

# Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan

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

Amounts reported as deferred outflows of resources and deferred inflows of resources (excluding employer specific amounts) related to pensions will be recognized in pension expense as follows (in thousands):

Year ending June 30	
2021	\$ (3,148)
2022	(944)
2023	1,273
2024	(357)
2025	1,930
Thereafter	4,151
Total	\$ 2,905

#### Changes in Proportion

The previous amounts do not include employer specific deferred outflows of resources and deferred inflows of resources related to changes in proportion. These amounts should be recognized (amortized) by each employer over the average of the expected remaining service lives of all plan members, which is 9 years for the 2020 amounts.

#### 6. Collective Pension Expense

The components of collective pension expense for the year ending June 30, 2020 (excluding that attributable to employer-paid member contributions) are as follows (in thousands):

Interest on total pension liability  Member contributions  Administrative expense  Changes in benefit terms  Projected earnings on plan investments  Recognition of deferred outflows and inflows of resources:  Differences between projected and actual earnings on plan investments  Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability  Changes in assumption with regards to factors or other inputs in the	Service cost	\$ 17,388
Administrative expense 156 Changes in benefit terms - Projected earnings on plan investments (28,121) Recognition of deferred outflows and inflows of resources: Differences between projected and actual earnings on plan investments (263) Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability 1,449	Interest on total pension liability	30,598
Changes in benefit terms  Projected earnings on plan investments  Recognition of deferred outflows and inflows of resources:  Differences between projected and actual earnings on plan investments  Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability  1,449	Member contributions	(6,538)
Projected earnings on plan investments (28,121)  Recognition of deferred outflows and inflows of resources:  Differences between projected and actual earnings on plan investments (263)  Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability 1,449	Administrative expense	156
Recognition of deferred outflows and inflows of resources:  Differences between projected and actual earnings on plan investments  Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability  1,449	Changes in benefit terms	-
Differences between projected and actual earnings on plan investments  Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability  1,449	Projected earnings on plan investments	(28,121)
Differences between expected and actual experiences with regards to factors or other inputs in the measurement of total pension liability 1,449	Recognition of deferred outflows and inflows of resources:	
factors or other inputs in the measurement of total pension liability 1,449	· ·	(263)
· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
( hanges in assumption with regards to factors or other inputs in the	· · · · · · · · · · · · · · · · · · ·	1,449
	Changes in assumption with regards to factors or other inputs in the	10.1
measurement of total pension liability 481	measurement of total pension liability	481
Pension expense \$ 15,150	Pension expense	\$ 15,150

#### 7. Risks and Uncertainties

On January 30, 2020, the World Health Organization ("WHO") announced a global health emergency because of a new strain of coronavirus originating in Wuhan, China (the "COVID-19 outbreak") and the risks to the international community as the virus spread globally beyond its point of origin. In March 2020, the WHO classified the COVID-19 outbreak as a pandemic, based on the rapid increase in exposure globally.

# Delaware Public Employees' Retirement System County & Municipal Police and Firefighters' Pension Plan Notes to Schedule of Employer Allocations and Schedule of Pension Amounts by Employer

The full impact of the COVID-19 outbreak continues to evolve as of the date of this report. This pandemic has adversely affected global economic activity and greatly contributed to instability in financial markets. While the Plan's investment portfolio has a long-term strategy, it experienced increased volatility and significant fluctuations in fair value since June 30, 2020. Such changes in market value and possible changes to the actuarial assumptions used in determining the net pension liability, such as discount rates and rates of retirement and termination as a result of the COVID-19 outbreak may result in significant changes to the total amount of liability, deferred inflows, deferred outflows, and pension expense to be allocated to participating employers in future periods. However, the actual impact, if any, cannot be determined at this time.

#### 8. Subsequent Events

The Plan evaluated all subsequent events through May 21, 2021 the date that the schedules were available to be issued.



Tel: 302-656-5500 Fax: 302-656-8024 www.bdo.com

# 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 pension liability, total deferred outflows of resources, total deferred inflows of resources, and total pension expense excluding that attributable to employer-paid member contributions as of and for the year ended June 30, 2020 (specified column totals), included in the schedule of pension amounts by employer of the Delaware Public Employees' Retirement System - County & Municipal Police and Firefighters' Pension Plan (the Plan) (hereafter collectively referred to as the Schedules) and the related notes and have issued our report thereon dated May 21, 2021.

#### Internal Control over Financial Reporting

In planning and performing our audit of the Schedules, 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 Schedules, 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 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 Plan'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**

BDO USA, LLP

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.

May 21, 2021