



FISCAL YEAR 2025

ANNUAL REPORT



Amid ongoing concerns about inflation and economic uncertainty, the District's college savers continued to persevere in 2025.

During the year plan assets rose by 16 percent, new account openings declined by 12 percent. The decline in new account openings is likely due to broader economic and political instability, including a federal government shutdown. In light of those headwinds, the District maintained strong engagement efforts.

In 2025, the District conducted two targeted incentive campaigns designed to encourage new enrollments. The first campaign offered a \$25 matching contribution for a \$25 initial deposit for accounts opened during April, Financial Literacy Month. A total of 115 people took advantage of this offer.

The second campaign in September, focused on helping families start saving earlier by offering a \$50 contribution to newly opened accounts for beneficiaries aged five and younger. This campaign resulted in 75 new accounts.

Together, these incentive efforts contributed to 190 newly funded accounts totaling \$6,625.



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EXECUTIVE SUMMARY

Fiscal year 2025 was an up year for investors as both equity and fixed income markets produced positive results. U.S. equities, as measured by the S&P 500 Index had another strong year returning 17.6%. The technology sector remained the key driver of results this year, due to ongoing enthusiasm for artificial intelligence. Within international equity markets, emerging markets (MSCI Emerging Markets Index 17.3%) outpaced developed markets (MSCI EAFE Index 15.0%). During fiscal year 2025, the bond markets rose as rates fell, driven by a continued decline in inflation. This and the weakening labor market led to the Fed cutting interest rates by 0.5% during the fiscal year ending September 30th. The Bloomberg Aggregate Index increased 2.9%. Non-U.S. fixed income was up 10.2% as measured by the Bloomberg Global Aggregate Ex USD 10% Issuer Capped Index Hedged US Dollar.

The D.C. College Savings Plan ("Plan") assets increased in fiscal year 2025. Assets increased from \$1.4 billion to \$1.6 billion, an increase of 15.9%. The Plan added 1,376 net new accounts. At the end of the fiscal year, the Plan had 43,826 funded accounts with an average account balance of \$37,455.

Ascensus, the Plan administrator, continued their very effective communication and education campaigns to current and prospective account owners covering a wide range of topics including enrollment information, investment strategies, tax benefits and Ugift® (a program that allows friends and family to contribute to any account). These outreach initiatives were communicated using emails, digital, and public advertisements.

In fiscal year 2025, Ascensus continued to ensure that all Wards of the District were made aware of the Plan by holding a combination of workshops and virtual webinars at a variety of employer and community sites. In addition, Ascensus staffed information tables at different venues to help raise awareness on the importance of saving for education. 2025 brought a slight decrease in new enrollments compared to last year and an increase in contributions of \$12.5 million or 8.6%.

The Office of Finance and Treasury ("OFT") regularly reviews the performance of the funds with our independent consulting firm, Meketa Investment Group. The operations of the Plan and its assets are examined each year by an independent accounting firm. For the nineteenth consecutive year, the Plan received an unqualified (clean) opinion from the auditor, BCA Watson Rice. The audited financial statements are included in this report as an appendix.

We hope the information in this report helps you gain a better understanding of the Plan, as well as the oversight performed on an ongoing basis by the OFT. We will continue to manage the Plan prudently for our participants.

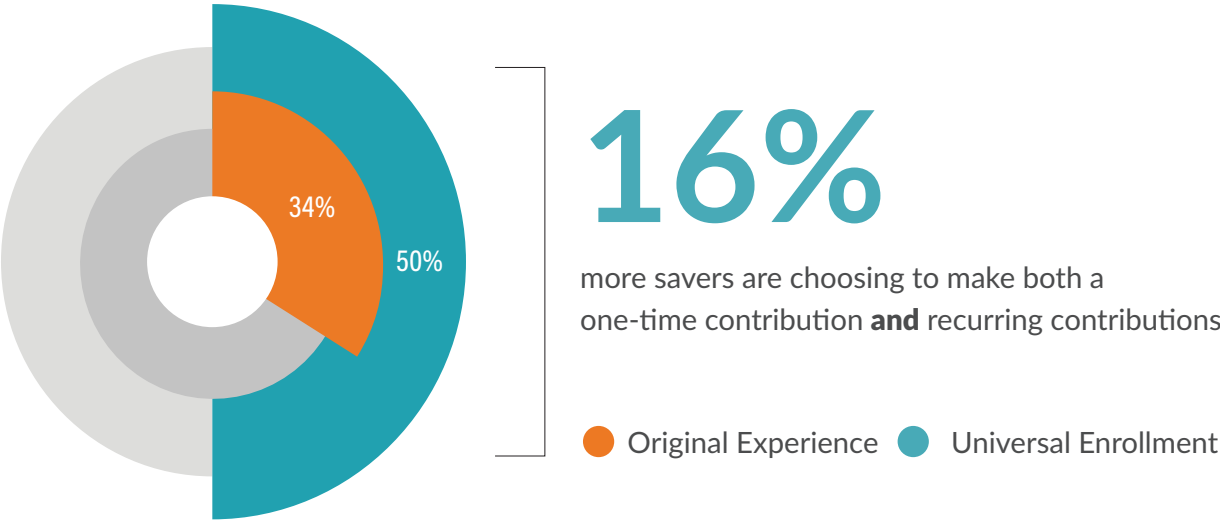
PLAN HIGHLIGHTS

Breaking Down Savings Barriers with Universal Enrollment

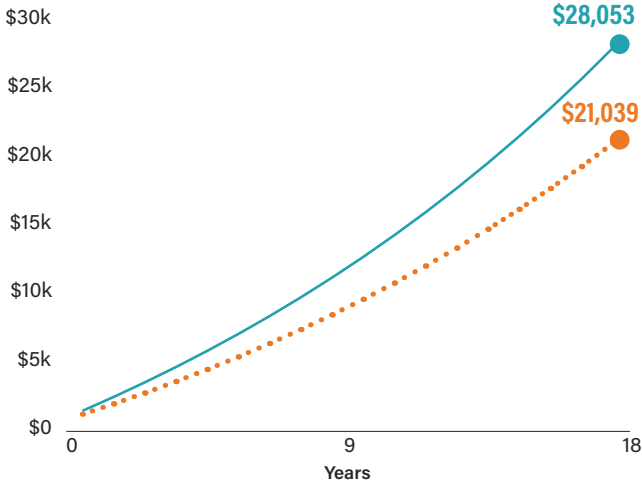
Our modernized enrollment flow, Universal Enrollment, streamlines the process to make getting started easier and more intuitive. A seamless experience across all devices—including the ability to save progress—and simplified prompts help reduce decision making friction and encourage stronger savings behaviors.

Measurable results

In the original enrollment experience, users tended to choose either a one-time contribution or recurring contributions. However, our most successful savers do both, and Universal Enrollment is driving that behavior.



Savers could be better equipped to cover future education costs. Account owners using Universal Enrollment are increasing their recurring contribution amount by \$16.62, compared to the original experience.



Universal Enrollment
Average savings: \$80/month

Original Experience
Average savings: \$60/month

Saving \$20 more a month
throughout a child's life can potentially make a meaningful difference.

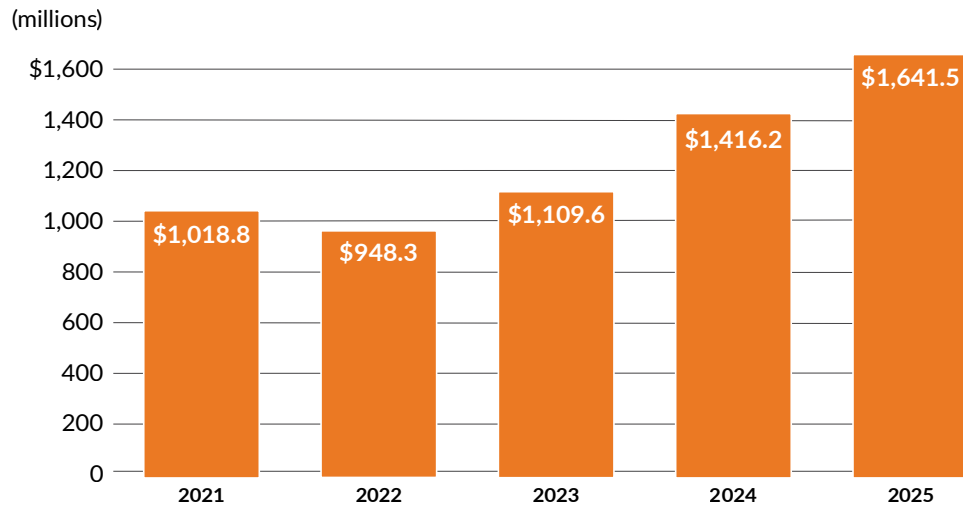
This hypothetical example assumes college begins at age 18 and is based on a 5 percent rate of return compounded daily. It is for illustrative purposes only. It does not reflect an actual investment in any particular 529 plan or taxes, if any, payable upon withdrawal.



Assets

The year delivered strong year-over-year growth in assets, which increased 15.9% in 2025 to \$1.6 billion.

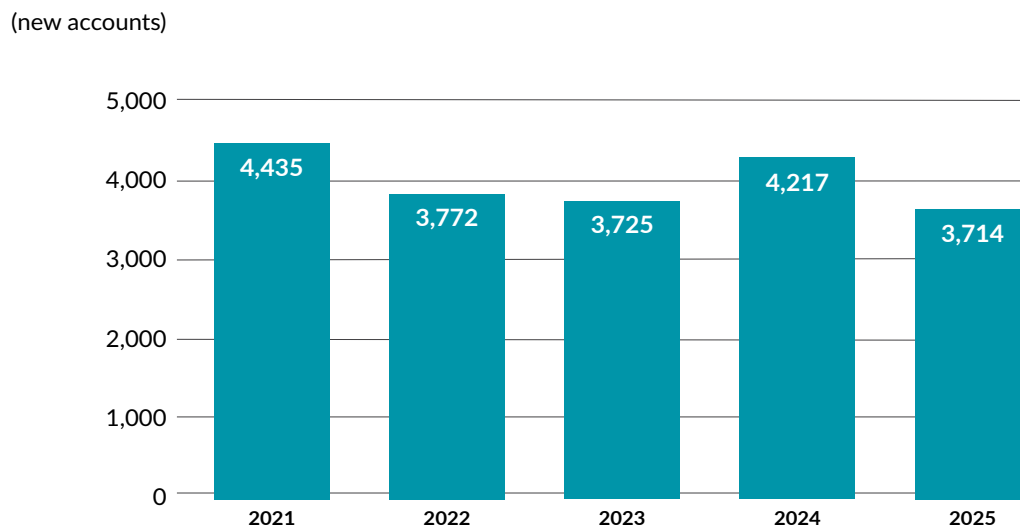
For Years Ending September 30th



Enrollment

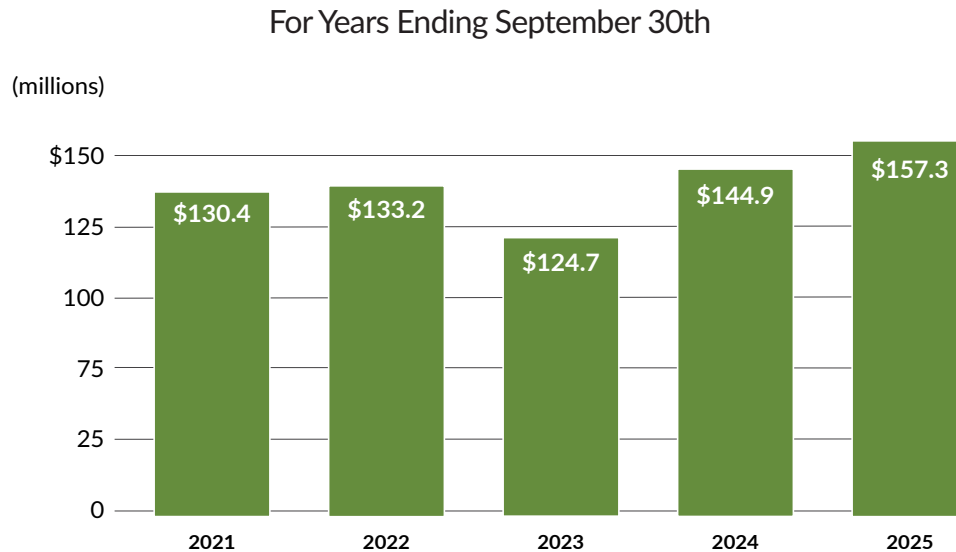
In fiscal year 2025, we added 3,714 new accounts. Our Community and Employer Outreach efforts helped grow Plan awareness inside the District.

For Years Ending September 30th



Contributions

Contributions to current and new participant accounts in fiscal year 2025 totaled \$157.3 million. A strong sales team and consistent broad messaging helped drive brand awareness and sales.



Access

An important aspect of the Plan is making all District residents, regardless of socioeconomic background, aware of the importance of higher education. Our Community Outreach and Marketing efforts were highlighted by 77 in-person events in Wards 7 and 8 throughout the fiscal year.

We expect to continue offering in-person and virtual events throughout 2026. Our focus remains on reaching all District residents and the D.C. College Savings Plan team will continue to pursue every opportunity to ensure all families can learn about the benefits to saving for higher education and K-12 tuition expense at private, public or parochial schools, vocation and trade schools, registered apprenticeship programs and the payments of student loans. Dates of all events and registration for our virtual offerings can be found on the Plan's website: www.dccollegesavings.com/home/community/event-calendar.html.

Ugift®

Ugift® is an easy, free-to-use service that lets family and friends give the meaningful gift of money into a D.C. College Savings Plan account. Saving for college can take a village and Ugift makes it easy for Account Owners to get help from their network of family and friends. Instead of giving toys, clothes, or other traditional gifts that a child will outgrow, gift givers get the satisfaction of knowing that their generosity can make a lasting impression. Total Ugift contributions in fiscal year 2025 totaled over \$11.3 million.

Upromise®

Upromise® is a free service that helps families save for college. When you open a new Upromise account and link your first D.C. College Savings Plan account, Upromise provides unique opportunities for members to earn cash back rewards for everyday activities such as shopping and dining when paying with the Upromise® Mastercard®. By the end of fiscal year 2025, D.C. College Savings Plan Account Owners added over \$47,023 in Upromise savings to their accounts.



DESCRIPTION OF INVESTMENT OPTIONS

The D.C. College Savings Plan is designed to offer various alternatives to meet the risk tolerance and investment objective of most investors. Participants have the option to choose one or any combination of the following three tiers of investment options:

1. The **Year of Enrollment Portfolios**, provides a low-cost, diversified investment allocation, which becomes more conservative as the beneficiary approaches their enrollment date.

Within the Year of Enrollment Portfolios, there are seven portfolios, with asset allocations designed to be appropriate for a certain number of years until the beneficiary is enrolled in college. The further the beneficiary is from enrollment, the greater the equity exposure. Every six months, the Year of Enrollment Portfolios will decrease the equity exposure and increase the fixed income or cash preservation exposure. Most of the underlying investments are passively managed (track specific indexes) to keep expenses low.

2. The **Individual Portfolios** are a diverse group of investment options, which you can use to create your personal investment allocation mix by investing in one or more of the portfolios.

In the Individual Portfolios, there are eight Investment Options with a diverse range of investment strategies. The portfolio strategies include Passively Managed (index tracking) and Actively Managed (Manager determines allocation mix), Domestic and International Fixed Income Options, Domestic and International Equity Options and even Domestic and International Socially Conscious Options.

3. The **Principal Protected Portfolio** focuses on protecting the principal you invest, by allocating your contributions and earnings to a Funding Agreement issued by Ameritas Life Insurance Corp. to the District of Columbia Section 529 Plan Trust. The current Funding Agreement provides interest credited daily at a minimum annual effective rate of interest of 1% and provides the opportunity for additional interest. The principal and the stated interest rate are insured by the contract provided by Ameritas Life Insurance Corp.¹

The Principal Protected Portfolio provides an option for those whose primary investment objective is the protection of the principal they invest. This Portfolio can also be used along with the Individual Portfolios in creating a personal diversified investment allocation mix.

Please reference the Program Disclosure Booklet for more details.

¹Accumulations (including contributions and earnings) under the Funding Agreement for the Principal Protected Portfolio credited to the Plan are subject to the claims-paying ability of Ameritas Life Insurance Corp. The Annualized Rate is updated quarterly. For the period 07/01/2025 to 09/30/2025 the crediting rate was 3.00%.

PERFORMANCE SUMMARY OF INVESTMENT OPTIONS

Performance as of 9/30/2025

Total Market Value: \$1,641,493,209

Fund Name	Market Value	% of Plan	3 Months	YTD	1 Year	3 Years	5 Years	10 Years	Inception	Inception Date
Year of College Enrollment Portfolios										
DC College Savings 2043 Portfolio	\$24,205,118	1.47%	6.64%	16.33%	14.49%				17.97%	07/07/23
DC Custom 2043 Benchmark			6.72%	16.17%	14.45%				18.17%	07/08/23
DC College Savings 2040 Portfolio	\$63,167,349	3.85%	6.02%	14.99%	13.29%	19.56%			7.11%	11/19/21
DC Custom 2040 Benchmark			6.18%	14.95%	13.28%	19.78%			7.26%	11/19/21
DC College Savings 2037 Portfolio	\$111,780,844	6.81%	5.45%	13.64%	11.96%	17.14%	10.10%		9.57%	09/06/19
DC Custom 2037 Benchmark			5.51%	13.52%	11.92%	17.34%	10.53%		9.89%	09/06/19
DC College Savings 2034 Portfolio	\$185,442,267	11.30%	4.62%	11.70%	10.12%	14.52%	8.24%		8.14%	03/24/17
DC Custom 2034 Benchmark			4.62%	11.60%	10.15%	14.77%	8.69%		8.48%	03/24/17
DC College Savings 2031 Portfolio	\$164,694,114	10.03%	3.61%	9.57%	8.15%	11.85%	6.43%		6.80%	03/24/17
DC Custom 2031 Benchmark			3.70%	9.59%	8.35%	12.20%	6.87%		7.13%	03/24/17
DC College Savings 2028 Portfolio	\$151,793,882	9.25%	2.57%	7.00%	6.05%	8.93%	4.55%		5.35%	03/24/17
DC Custom 2028 Benchmark			2.72%	7.30%	6.65%	9.59%	5.03%		5.71%	03/24/17
DC College Savings In College Portfolio	\$194,073,825	11.82%	1.56%	4.25%	4.34%	4.97%	3.12%		3.12%	03/24/17
DC Custom In College Benchmark			1.82%	5.06%	5.52%	6.70%	3.72%		3.32%	03/24/17
Principal Protected Portfolio										
Principal Protected Portfolio	\$58,639,668	3.57%	0.75%	2.10%	2.87%	2.65%	2.42%		2.33%	03/24/17
Citi Treasury Bill 3 Mon USD			1.11%	3.34%	4.61%	4.98%	3.10%		2.45%	03/24/17
Individual Portfolios										
U.S. Intermediate-Term Bond Index Portfolio	\$17,859,796	1.09%	1.99%	5.90%	2.63%	4.61%	-0.64%		1.45%	03/24/17
Bloomberg U.S. Agg Bond TR USD			2.03%	6.13%	2.88%	4.93%	-0.45%		1.83%	03/24/17
Intermediate-Term Bond Portfolio	\$15,075,997	0.92%	2.22%	6.87%	3.10%	5.23%	-0.13%		2.14%	03/24/17
Bloomberg U.S. Agg Bond TR USD			2.03%	6.13%	2.88%	4.93%	-0.45%		1.83%	03/24/17
U.S. Total Stock Market Index Portfolio	\$394,496,047	24.03%	8.16%	14.10%	17.04%	23.73%	15.03%		13.74%	03/24/17
U.S. Equity Custom Benchmark*			8.24%	14.35%	17.37%	24.08%	15.67%		14.31%	03/24/17

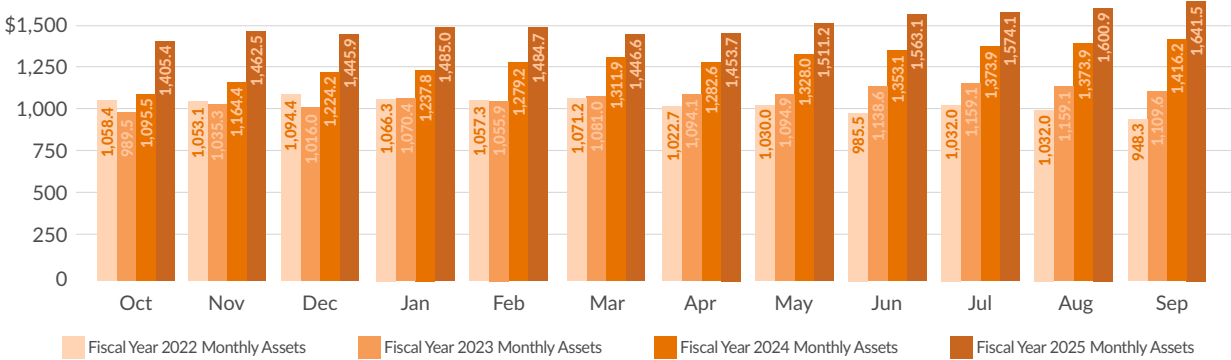
*The S&P US Total Market Index served as the underlying benchmark from March 24, 2017 through November 19, 2021. Thereafter, the CRSP US Total Market Index has been the underlying benchmark for the US Total Stock Market Index Portfolio.

PERFORMANCE SUMMARY OF INVESTMENT OPTIONS (CONTINUED)

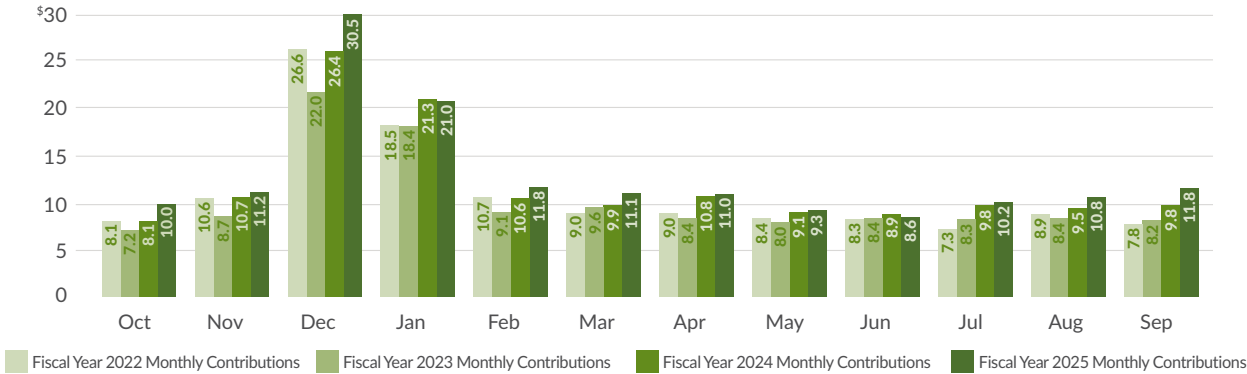
Fund Name	Market Value	% of Plan	3 Months	YTD	1 Year	3 Years	5 Years	10 Years	Inception	Inception Date
Individual Portfolios										
U.S. Large Cap Equity Portfolio	\$132,776,896	8.09%	8.52%	13.87%	15.13%	23.87%	16.18%		15.24%	03/24/17
S&P 500 TR USD			8.12%	14.83%	17.60%	24.94%	16.47%		15.02%	03/24/17
U.S. Socially Responsible Equity Portfolio	\$41,669,301	2.54%	8.18%	12.87%	15.12%	23.73%	16.05%		14.30%	03/24/17
Russell 3000 TR USD			8.18%	14.40%	17.41%	24.12%	15.74%		14.40%	03/24/17
U.S. Small Cap Equity Portfolio	\$37,415,781	2.28%	11.53%	10.78%	12.30%	19.98%	17.53%		10.23%	03/24/17
MSCI U.S. Small Cap 1750 GR USD			10.31%	9.35%	9.87%	15.98%	13.41%		9.65%	03/24/17
Non-U.S. Total Stock Market Index Portfolio	\$33,145,758	2.02%	6.64%	26.01%	16.91%	20.27%	9.91%		7.46%	03/24/17
MSCI ACWI Ex USA IMI NR USD			6.86%	25.97%	16.39%	20.50%	10.22%		7.75%	03/24/17
Non-U.S. Socially Responsible Equity Portfolio	\$15,256,569	0.93%	4.67%	27.16%	17.46%	22.58%	10.86%		8.29%	03/24/17
MSCI World ex USA NR USD			5.33%	25.34%	16.03%	21.60%	11.60%		8.27%	03/24/17
Total assets ending September 30, 2025	\$1,641,493,209									

PLAN STATISTICS

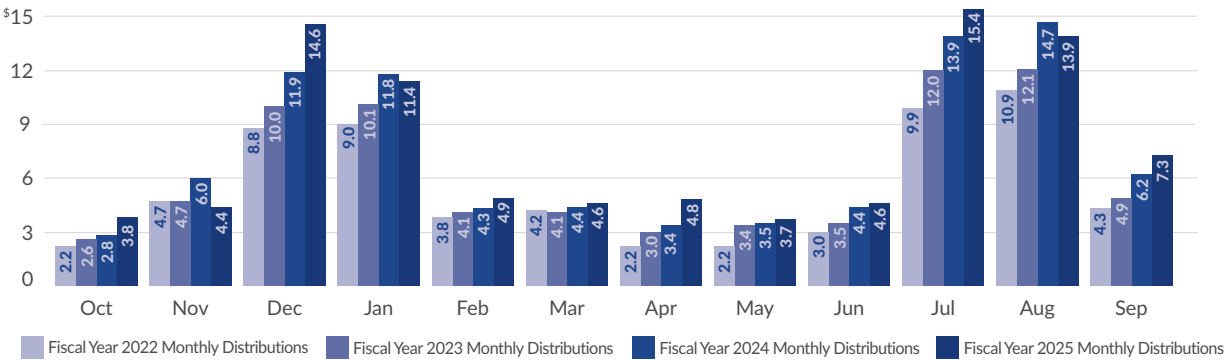
MONTHLY TOTAL ASSETS YEAR-OVER-YEAR COMPARISON (\$ millions) as of 9/30/2025



MONTHLY CONTRIBUTIONS YEAR-OVER-YEAR COMPARISON (\$ millions) as of 9/30/2025



MONTHLY DISTRIBUTIONS YEAR-OVER-YEAR COMPARISON (\$ millions) as of 9/30/2025



529 PLANS: A VERSATILE TOOL FOR EVERY STAGE OF EDUCATION

A 529 Plan is often viewed as a savings tool reserved strictly for college tuition. In reality, it offers far greater flexibility, supporting a wide range of educational expenses and paths.

Beyond the university

The truth is: Qualified educational expenses expand well beyond traditional higher education—or even just children’s needs. Adults can also use 529 Plan funds to pursue their own learning goals. Qualified expenses include:

- **K-12 expenses:** As of 2026, families can withdraw up to \$20,000 per student annually for tuition and qualified expenses at private, public, and religious elementary and secondary schools.
- **Trade or vocational school:** From cosmetology to culinary school, a 529 Plan supports many hands-on career paths.
- **Registered apprenticeship:** Use 529 Plan savings to cover fees, supplies, and required tools as long as the apprenticeship is registered and certified with the Secretary of Labor under the National Apprenticeship Act.
- **Graduate school:** A 529 Plan supports lifelong learning. Funds can be used for master’s, doctoral, medical, and law degrees.



More than just tuition

A 529 Plan supports a broad spectrum of qualified educational expenses. Funds can be withdrawn completely tax-free¹ at any eligible institution² nationwide or abroad to cover:

- Tuition
- Fees
- Room and board
- Books
- Computers
- Required tools
- Student loan repayments³

Flexibility for an unpredictable future

A 529 Plan is designed with unpredictability in mind. If the designated beneficiary does not use the funds, there are several options:

- **Change the beneficiary:** Funds can be transferred to a qualifying family member, including siblings, first cousins, parents, or even the account owner.⁴
- **Rollover to a Roth IRA:** If funds are no longer needed for education, the money can be transferred to an individual retirement account.⁵
- **Withdraw for other expenses:** Pay tax on just the earnings portion and a 10% penalty.¹

Whether the future holds a university degree, a trade certification, or a high school diploma, a 529 Plan offers the flexibility to support those goals.

¹Earnings on non-qualified withdrawals may be subject to federal income tax and a 10% federal penalty tax, as well as state and local income taxes and recapture of DC tax deductions. Tax and other benefits are contingent on meeting other requirements and certain withdrawals are subject to federal, state, and local taxes.

²An eligible institution is one that can participate in federal financial aid programs.

³Principal or interest on any qualified education loan (as defined in section 221(d) of the Internal Revenue Code) of the designated beneficiary or a sibling of the designated beneficiary, up to a lifetime limit of \$10,000 per individual. Note, if you make an education loan repayment from your Account, Section 221(e) (1) of the Internal Revenue Code provides that you may not also take a federal income tax deduction for any interest included in that education loan repayment.

⁴Section 529 of the Internal Revenue Code defines a family member as: A son, daughter, stepson or stepdaughter, or a descendant of any such person; a brother, sister, stepbrother, or stepsister; the father or mother, or an ancestor of either; a stepfather or stepmother; a son or daughter of a brother or sister; a brother or sister of the father or mother; a son-in-law, daughter-in-law, father-in-law, mother-in-law, brother-in-law, or sister-in-law; the spouse of the beneficiary or the spouse of any individual described above; or a first cousin of the beneficiary. Gift or generation-skipping transfer taxes may apply. Please consult with your tax advisor for further information.

⁵The Roth IRA must belong to the same beneficiary, and the lifetime rollover limit is \$35,000. To be eligible, the 529 account must have been open for at least 15 years and the rollover amount must have been in the 529 account for 5 years. 529 to Roth IRA rollovers will also count toward annual Roth IRA contribution limits, but Roth IRA income limits do not apply for this type of contribution. For more information, please read the Program Description.

SPONSOR PROFILE:

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

The D.C. Chief Financial Officer (CFO) is responsible for the implementation and administration of the D.C. College Savings Act of 2002, D.C. Law 13-212, approved March 31, 2001, as amended by the College Savings Program Act of 2002, D.C. Law 14-307, approved June 5, 2003. Pursuant to D.C. Regulations, 49 DCR 9859, November 1, 2002, made final at D.C. Mun. Regs, tit. 9, sec. 155 (2004), the CFO entered into a Declaration of Trust, establishing the D.C. College Savings Program Trust, an instrumentality of the District of Columbia. In addition, pursuant thereto, the CFO or the Treasurer, as designated by the CFO, shall serve as the fiduciary and Trustee of the District of Columbia College Savings Program Trust.

The CFO or the Treasurer, as designee of the CFO, is responsible for selecting a qualified financial institution as the program manager to administer the Program. In addition, the CFO or the Treasurer, as designee of the CFO, is responsible for approving the selection of the underlying investments in the Trust. The CFO or the Treasurer of the District of Columbia, as designee of the CFO, is responsible for the administration of the Program.



SPONSOR PROFILE:

Ascensus College Savings Recordkeeping Services, LLC

Ascensus provides the District 529 program management, recordkeeping, investment management, marketing and customer service that makes saving for college easy and intuitive.

ABOUT ASCENSUS

Ascensus helps more than 16 million Americans save for the future—retirement, education and ABLE savings account—through technology-enabled solutions. With more than 45 years of experience, the firm offers tailored solutions that meet the needs of asset managers, banks, credit unions, state governments, financial professionals, employers and individuals. Ascensus supports over 254,200 retirement plans, over 741,900 savers with a balance in a state-facilitated retirement program, more than 8.5 million 529 education savings accounts and a growing number of ABLE savings accounts. It also administers more than 1.7 million IRAs. As of September 30, 2025, Ascensus had over \$919 billion in total assets under administration. For more information about Ascensus, visit ascensus.com.

SUB-CONTRACTORS FOR THE PLAN

Ascensus has chosen BNY Mellon and O'Neil Digital Solutions to provide the D.C. College Savings Plan with:

- BNY Mellon – Cash custody and trading
- O'Neil Digital Solutions – Print vendor for statements, confirmations and correspondence

TENURE AS PROGRAM MANAGER

In January 2025, the contract with Ascensus was extended for another five-year term. After that time, the agreement between the trustee and Ascensus may be continued or terminated (in which case a different program manager may be selected).



Institutional Relationship Manager

David Rydzeski is an Institutional Relationship Manager for the D.C. College Savings Plan, the District's own 529 college saving program. He helps educate human resource and benefit professionals, school counselors and community groups on how to promote and encourage college savings.

Prior to Ascensus, David was responsible for the distribution of various investment products, both to institutions and retail investors. He now puts his career-long financial experience to work helping D.C. families save for college.

2025 marks the eighth full year since the conversion to Ascensus and through several new and key contacts, David has been able to showcase the D.C. College Savings Plan at different events throughout the year.

His outreach efforts covered every Ward in the District and included workshops at a variety of employer and community venues. In addition to the workshops, which help explain the nuances of the program to the parents and families in attendance, David also staffed information tables plus hosted virtual events at over 281 different venues to help raise awareness on the importance of saving for college and the benefits of the D.C. College Savings Plan.

To learn more about our outreach efforts, please visit the *Community* tab on our website, www.dccollegesavings.com.

Mr. Rydzeski is a registered representative of Ascensus Broker Dealer Services LLC, 877-529-2980, 95 Wells Ave, Suite 160, Newton, MA 02459 (member FINRA/SIPC) and is not employed by the District of Columbia.



District of Columbia Administrative Team



Pictured from left to right: Merzie Davis, Rodney Dickerson, Ken Alozie, Treasurer Carmen Pigler, Benedict Richardson, and Joseph Nzioki.

Carmen Pigler, D.C. Treasurer and Deputy CFO, manages multiple financial and investment programs for the District government. In addition to overseeing the administration of the D.C. College Savings Plan, she has oversight of the Office of Finance and Treasury which manages the District's cash and liquid assets, all cash disbursements, banking relationships, the 457(b) Deferred Compensation Plan, the 401(a) Retirement Plan, and the Other Post Employment Benefits Fund (OPEB).

Benedict Richardson, CFA, Associate Treasurer for Asset Management, Office of Finance and Treasury (OFT), oversees the District's investment programs including the general fund, the District's 401(a) and 457(b) retirement programs, the 529 College Savings program, and the District's OPEB Fund program. Mr. Richardson has oversight of the 529 Plan and the staff who manage the program.

Rodney Dickerson, Program Director, is responsible for managing the D.C. College Savings Plan, 457(b) Deferred Compensation Plan, 401(a) Retirement Plan, and the OPEB Plan. Mr. Dickerson provides oversight of the investments and operations and he manages the audit of the Plans. He crafts and reviews all Plan communications and facilitates quarterly meetings with the vendors.

Ken Alozie, CFA, CAIA, is the Program Manager responsible for managing operations and relationships with investment managers, record keepers, plan administrators, and contractors for the District's 401(a) Defined Contribution Retirement Plan, the 457(b) Deferred Compensation Plan, the D.C. 529 College Savings Plan, and Other Post-Employment Benefits (OPEB) Fund. Mr. Alozie is also responsible for developing goals, objectives and assigning responsibilities among programs, formulating improvement strategies and reporting on performance.

Merzie Davis, Financial Manager, is responsible for managing the day-to-day operations of the D.C. College Savings Plan and the 457(b) Deferred Compensation Plan. Mr. Davis also participates in the quarterly 529 investment meetings.

Joseph Nzioki, Financial Analyst, works closely with Rodney Dickerson, program director on the 401(a) Retirement Plan and OPEB Fund. He assists with the monthly asset reconciliation for the 401(a) and OPEB Fund. Mr. Nzioki participates in the quarterly 529 investment meetings.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF FINANCIAL OFFICER
OFFICE OF FINANCE AND TREASURY**

REPORT ON

**THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT AND ADMINISTRATIVE FUNDS**

**FINANCIAL STATEMENTS
AND
MANAGEMENT'S DISCUSSION AND ANALYSIS**

YEARS ENDED SEPTEMBER 30, 2025 AND 2024

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT AND ADMINISTRATIVE FUNDS**

**FINANCIAL STATEMENTS
AND
MANAGEMENT'S DISCUSSION AND ANALYSIS**

YEARS ENDED SEPTEMBER 30, 2025 AND 2024

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INDEPENDENT AUDITOR'S REPORT

To the Trustee of
The District of Columbia 529 College Savings Program Trust

Report on the Financial Statements

Opinion

We have audited the accompanying statements of fiduciary net position of the Participant Fund and Administrative Fund of the District of Columbia 529 College Savings Program Trust (the "Trust") as of September 30, 2025 and 2024, and the related statements of changes in fiduciary net position of the Participant Fund and Administrative Fund for the years then ended and the related notes to the financial statements, which collectively comprise the Trust's financial statements.

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the Trust, as of September 30, 2025 and 2024, and the respective changes in financial position for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

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

Responsibilities of Management for the Financial Statements

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.

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

Auditor's Responsibilities for the Audit of the Financial Statements

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

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Trust's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Trust's ability to continue as a going concern for a reasonable period of time.

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

Required Supplementary Information

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

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated December 12, 2025, on our consideration of the Trust'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 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 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 Trust's internal control over financial reporting and compliance.

Washington, D.C. *Watson Rice LLP*
December 12, 2025

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

The following presents management's discussion and analysis of the financial performance of the Government of the District of Columbia (the "District") 529 College Savings Program Trust (the "Program") for the fiscal years ended September 30, 2025 and 2024. This discussion and analysis should be read in conjunction with the financial statements and note disclosures.

Basic Financial Statements

The Program is accounted for as a private purpose trust fund of the District. The District has overall fiduciary responsibility to program participants to administer the operations of the Program. The Program's basic financial statements, which are reported on the accrual basis of accounting, are the: (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 which are an integral part of the financial statements.

- The Statement of Fiduciary Net Position presents the assets, liabilities, and net position of the Program.
- The Statement of Changes in Fiduciary Net Position presents the additions to and deductions from the Program's net position.
- The notes provide financial statement disclosures that are required by generally accepted accounting principles.

2025 Financial Highlights

- Investments increased by \$224,026,633 or 15.85%
- Total liabilities decreased by \$379,989 or (37.24%)
- Participant contributions increased by \$12,476,621 or 8.61%
- Net investment income decreased by \$87,127,307 or (34.44%)
- Distributions to participants increased by \$6,147,183 or 7.04%

2024 Financial Highlights

- Investments increased by \$307,364,872 or 27.80%
- Total liabilities increased by \$652,005 or 177.01%
- Participant contributions increased by \$20,143,862 or 16.15%
- Net investment income increased by \$138,614,868 or 121.20%
- Distributions to participants increased by \$12,755,744 or 17.12%

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

Financial Analysis – Fiduciary Net Position

Table 1 - Condensed Statements of Fiduciary Net Position as of September 30, 2025, 2024 and 2023

	2025	2024	2023	2025 -2024		2024 -2023	
				Variance (\$)	Variance (%)	Variance (\$)	Variance (%)
ASSETS							
Cash and Cash Equivalents	\$ 2,549,925	\$ 1,706,508	\$ 1,915,883	\$ 843,417	49.42%	\$ (209,375)	(10.93%)
Investments	1,637,140,055	1,413,113,422	1,105,748,550	224,026,633	15.85%	307,364,872	27.80%
Receivables	2,443,586	2,356,242	2,261,284	87,344	3.71%	94,958	4.20%
Total Assets	1,642,133,566	1,417,176,172	1,109,925,717	224,957,394	15.87%	307,250,455	27.68%
LIABILITIES							
Total Liabilities	640,357	1,020,346	368,341	(379,989)	(37.24%)	652,005	177.01%
Net Position Held in Trust for Program Participants							
	\$ 1,641,493,209	\$ 1,416,155,826	1,109,557,376	\$ 225,337,383	15.91%	\$ 306,598,450	27.63%

Fiscal Year 2025

The Program's primary asset was investments, which totaled \$1,637,140,055. Investments increased by 15.85% over fiscal year 2024 because of asset growth due to market performance and the excess of contributions over distributions to participants. Market conditions overall remained favorable in fiscal year 2025, benefiting from easing of interest rates during the period, and as a result, all sixteen (16) Program funds generated positive rates of return. The Program's funds invest in one or more underlying investments. The underlying investments are primarily held in mutual funds and a principal protected portfolio.

Receivables primarily consist of amounts due for investments sold, as well as interest and dividend income earned, but not yet received by the Program. These receivables increased by \$87,344 or 3.71% over the prior fiscal year primarily because of an increase in unsettled investments sales and accrued interest.

Total liabilities decreased by \$379,989 or (37.24%) from the prior fiscal year. The decrease was primarily a result of the timing of unsettled investment purchases at the end of fiscal year 2025 verses at the end of fiscal year 2024.

As shown in **Table 2a - Investment by Fund with Rates of Returns as of September 30, 2025**, the top four Program investments, by investment value, were held in the U.S. Total Stock Market Index Portfolio (\$394,434,322 or 24.2%); DC College Savings In College Portfolio (\$193,329,259 or 11.8%); DC College Savings 2034 Portfolio (\$184,501,041 or 11.3%), and DC College Savings 2031 Portfolio (\$163,848,898 or 10.0%).

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

Table 2a - Investment by Fund with Rates of Returns as of September 30, 2025

	<u>Investment Value</u>	<u>Percent of Total Assets</u>	<u>Rate of Return %</u>
DC College Savings 2028 Portfolio	\$ 151,185,922	9.2%	6.05%
DC College Savings 2031 Portfolio	163,848,898	10.0%	8.15%
DC College Savings 2034 Portfolio	184,501,041	11.3%	10.12%
DC College Savings 2037 Portfolio	111,183,244	6.8%	11.96%
DC College Savings 2040 Portfolio	62,823,376	3.8%	13.29%
DC College Savings 2043 Portfolio	24,055,261	1.5%	14.49%
DC College Savings In College Portfolio	193,329,259	11.8%	4.34%
Intermediate-Term Bond Portfolio	15,076,699	0.9%	3.10%
Non-U.S. Socially Responsible Equity Portfolio	15,255,920	0.9%	17.46%
Non-U.S. Total Stock Market Index Portfolio	33,124,420	2.0%	16.91%
Principal Protected Portfolio	58,658,738	3.6%	2.87%
U.S. Intermediate-Term Bond Index Portfolio	17,855,050	1.1%	2.63%
U.S. Large Cap Equity Portfolio	132,744,370	8.1%	15.13%
U.S. Small Cap Equity Portfolio	37,410,199	2.3%	12.30%
U.S. Socially Responsible Equity Portfolio	41,653,336	2.5%	15.12%
U.S. Total Stock Market Index Portfolio	394,434,322	24.2%	17.04%
TOTAL	<u>\$ 1,637,140,055</u>	<u>100.0%</u>	

Fiscal Year 2024

The Program's primary asset was investments, which totaled \$1,413,113,422. Investments increased by 27.80% over fiscal year 2023 because of asset growth and the excess of contributions over distributions to participants. Market conditions overall remained favorable in fiscal year 2024, and as a result, all of the seventeen (17) Program funds generated positive rates of return. The Program's funds invest in one or more underlying investments. The underlying investments are primarily held in mutual funds and the Principal Protected Portfolio.

Receivables primarily consist of amounts due for investments sold, as well as interest and dividend income earned, but not yet received by the Program. These receivables increased by \$94,958 or 4.20% over the prior fiscal year primarily because of an increase in unsettled investments sales and accrued interest.

Total liabilities increased by \$652,005 or 177.01% over the prior fiscal year. The increase was primarily a result of the timing of unsettled investment purchases near the end of the year and program management fees associated with the purchases.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

As shown in **Table 2b - Investment by Fund with Rates of Returns as of September 30, 2024**, the top four Program investments, by investment value, were held in the U.S. Total Stock Market Index Portfolio (\$345,877,234 or 24.5%); DC College Savings 2034 Portfolio (\$156,816,460 or 11.1%), DC College Savings 2031 Portfolio (\$141,116,935 or 10.0%); and, DC College Savings 2028 Portfolio (\$129,632,005 or 9.2%).

Table 2b – Investment by Fund with Rates of Returns as of September 30, 2024

	Investment Value	Percent of Total Assets	Rate of Return %
DC College Savings 2025 Portfolio	\$ 108,047,003	7.6%	8.32%
DC College Savings 2028 Portfolio	129,632,005	9.2%	13.87%
DC College Savings 2031 Portfolio	141,116,935	10.0%	18.08%
DC College Savings 2034 Portfolio	156,816,460	11.1%	21.58%
DC College Savings 2037 Portfolio	86,982,774	6.2%	25.10%
DC College Savings 2040 Portfolio	40,920,118	2.9%	28.17%
DC College Savings 2043 Portfolio	6,152,131	0.4%	29.27%
DC College Savings In College Portfolio	101,059,347	7.1%	6.59%
Intermediate-Term Bond Portfolio	13,985,314	1.0%	11.84%
Non-U.S. Socially Responsible Equity Portfolio	12,152,219	0.9%	27.22%
Non-U.S. Total Stock Market Index Portfolio	23,484,638	1.7%	24.14%
Principal Protected Portfolio	50,010,495	3.5%	2.69%
U.S. Intermediate-Term Bond Index Portfolio	14,346,178	1.0%	11.10%
U.S. Large Cap Equity Portfolio	113,324,856	8.0%	37.28%
U.S. Small Cap Equity Portfolio	33,828,940	2.4%	31.68%
U.S. Socially Responsible Equity Portfolio	35,376,775	2.5%	35.26%
U.S. Total Stock Market Index Portfolio	345,877,234	24.5%	34.83%
TOTAL	\$ 1,413,113,422	100.0%	

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

Financial Analysis – Changes in Fiduciary Net Position

Table 3 – Condensed Statements of Changes in Fiduciary Net Position as of September 30, 2025, 2024 and 2023

	2025	2024	2023	2025-2024		2024-2023	
				Variance (\$)	Variance (%)	Variance (\$)	Variance (%)
ADDITIONS							
Contributions	\$ 157,331,612	\$ 144,854,991	\$ 124,711,129	\$ 12,476,621	8.61%	\$ 20,143,862	16.15%
Net Investment Income	<u>165,859,127</u>	<u>252,986,434</u>	<u>114,371,566</u>	<u>(87,127,307)</u>	(34.44%)	<u>138,614,868</u>	121.20%
Total Additions	<u>323,190,739</u>	<u>397,841,425</u>	<u>239,082,695</u>	<u>(74,650,686)</u>	(18.76%)	<u>158,758,730</u>	66.40%
DEDUCTIONS							
Distributions to Participants	93,404,206	87,257,023	74,501,279	6,147,183	7.04%	12,755,744	17.12%
Other Expenses	<u>4,449,150</u>	<u>3,985,952</u>	<u>3,366,876</u>	<u>463,198</u>	11.62%	<u>619,076</u>	18.39%
Total Deductions	<u>97,853,356</u>	<u>91,242,975</u>	<u>77,868,155</u>	<u>6,610,381</u>	7.24%	<u>13,374,820</u>	17.18%
Increase in Net Position	<u>\$ 225,337,383</u>	<u>\$ 306,598,450</u>	<u>\$ 161,214,540</u>	<u>\$ (81,261,067)</u>	(26.50%)	<u>\$ 145,383,910</u>	90.18%

Fiscal Year 2025

The Program's contributions increased by \$12,476,621 or 8.61% over the prior fiscal year. The year-over-year changes reflect the savings decisions made by the participants and the actions of the program manager to process these transactions. The Program had an increase in total participants from 43,218 in fiscal year 2024 to 44,524 in fiscal year 2025. Total participants include both funded and unfunded accounts.

The Program had net investment income of \$165,859,127 in fiscal year 2025, compared to a net investment income of \$252,986,434 in fiscal year 2024, which is a (34.44%) decrease year over year. The net investment income moderated during fiscal year 2025. While favorable market conditions persisted in fiscal 2025, investment performance was below fiscal year 2024 levels. Interest and dividends increased 6.94% year over year, from \$9,527,281 in fiscal year 2024 to \$10,188,526 in fiscal year 2025. Overall, each of the sixteen (16) funds of the Program reflected positive rates of return, which contributed to a net appreciation in the fair value of investments for the year. For fiscal year 2025, the Program's investments collectively had a weighted average rate of return of 11.01%, a decrease of 1,117 basis points from the weighted average rate of return of 22.18% in fiscal year 2024.

Distributions to participants in 2025 increased by \$6,147,183 or 7.04% over fiscal year 2024. This increase is due to individual participant tuition funding requirements likely influenced by increases in tuition, college fees and the effects of inflation and the timing of distributions to participants as funds are utilized to pay for college expenses or other purposes.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**MANAGEMENT'S DISCUSSION AND ANALYSIS (UNAUDITED)
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

Other expenses include program management fees, administrative and maintenance expenses. The overall increase of 11.62% in other expenses is primarily due to an increase in program management fees from \$3,108,717 in fiscal year 2024 to \$3,456,714 in fiscal year 2025. For fiscal year 2025, program management and administrative fees were on average approximately 0.23% and 0.05%, respectively, of the funds average daily net asset value. Underlying investment management fees ranged from 0.0% to 0.44% for the various investment options.

Fiscal Year 2024

The Program's contributions increased by \$20,143,862 or 16.15% over the prior fiscal year. The year-over-year changes reflect the savings decisions made by the participants and the actions of the program manager to process these transactions. The Program had an increase in participants from 39,661 in fiscal year 2023 to 43,218 in fiscal year 2024.

The Program had net investment income of \$252,986,434 in fiscal year 2024, compared to a net investment income of \$114,371,566 in fiscal year 2023, which is a 121.20% increase year over year. The net investment income was primarily due to continued favorable market conditions in fiscal 2024 resulting in a substantial increase in the fair value of investments from fiscal year 2023. Interest and dividends also increased from \$8,133,180 in fiscal year 2023 to \$9,527,281 in fiscal year 2024. Overall, each of the seventeen (17) funds of the Program reflected positive rates of return, which contributed to a net appreciation in the fair value of investments for the year. For fiscal year 2024, the Program's investments collectively had a weighted average rate of return of 22.18%, an increase of 1,032 basis points from the weighted average rate of return of 11.86% in fiscal year 2023.

Distributions to participants in 2024 increased by \$12,755,744 or a 17.12% over fiscal year 2023. This increase is due to individual participant tuition funding requirements likely influenced by increases in tuition, college fees and the effects of inflation and the timing of distributions to participants as funds are utilized to pay for college expenses or other purposes.

Other expenses include program management fees, and administrative and maintenance expenses. The overall increase in other expenses is primarily due to an increase in program management fees from \$2,589,585 in fiscal year 2023 to \$3,108,717 in fiscal year 2024. For fiscal year 2024, program management and administrative fees were on average 0.25% and 0.05%, respectively, of the funds average daily net asset value. Underlying investment management fees ranged from 0.00% to 0.44% for the various investment options.

Contact Information

This financial report is designed to provide a general overview of the Program's finances. Questions concerning any information provided in this report, or requests for additional financial information, should be addressed to the Office of the Chief Financial Officer (Office of Finance and Treasury), Government of the District of Columbia, 1101 4th Street SW, 8th Floor, Washington, DC 20024.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**STATEMENTS OF FIDUCIARY NET POSITION
SEPTEMBER 30, 2025 AND 2024**

	2025	2024
ASSETS		
Cash and Cash Equivalents	\$ 2,549,925	\$ 1,706,508
Receivables:		
Interest and Dividends	1,113,829	905,199
Accounts Receivable for Investments Sold	1,329,757	1,451,043
Total Receivables	2,443,586	2,356,242
Investments:		
Equity Mutual Funds	1,025,139,359	881,567,632
Fixed Income Mutual Funds	331,736,664	290,408,226
Guaranteed Investment Contracts	280,264,032	241,137,564
Total Investments	1,637,140,055	1,413,113,422
Total Assets	1,642,133,566	1,417,176,172
LIABILITIES		
Accounts Payable for Investments Purchased	273,508	541,354
Program Management Fees Payable	300,198	422,001
Due to D.C. Government Administrative Fund	66,651	56,991
Total Liabilities	640,357	1,020,346
Net Position Held in Trust for Program Participants	\$ 1,641,493,209	\$ 1,416,155,826

The notes to the financial statements are an integral part of this statement.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
PARTICIPANT FUND**

**STATEMENTS OF CHANGES IN FIDUCIARY NET POSITION
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

	2025	2024
ADDITIONS		
Contributions	\$ 157,331,612	\$ 144,854,991
Net Investment Income:		
Net Appreciation in Fair Value of Investments	156,838,102	244,527,749
Interest and Dividends	10,188,526	9,527,281
Less: Investment Expenses	(1,167,501)	(1,068,596)
Total Net Investment Income	165,859,127	252,986,434
Total Additions	323,190,739	397,841,425
 DEDUCTIONS		
Distributions to Participants	93,404,206	87,257,023
Program Management Fees	3,456,714	3,108,717
Administrative Expenses	746,565	637,531
Maintenance Expenses and Enrollment Fees	245,871	239,704
Total Deductions	97,853,356	91,242,975
Change in Net Position	225,337,383	306,598,450
Net Position Held in Trust for Program Participants		
Beginning of Year	1,416,155,826	1,109,557,376
End of Year	\$ 1,641,493,209	\$ 1,416,155,826

The notes to the financial statements are an integral part of this statement.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
ADMINISTRATIVE FUND**

**STATEMENTS OF FIDUCIARY NET POSITION
SEPTEMBER 30, 2025 AND 2024**

	2025	2024
ASSETS		
Cash and Cash Equivalents	\$ 2,616,650	\$ 2,003,707
Receivables:		
Due from Program Manager	740	1,099
Due from Participant Fund	66,651	56,991
Total Receivables	67,391	58,090
Total Assets	2,684,041	2,061,797
LIABILITIES		
Accrued Expenses	143,159	87,909
Total Liabilities	143,159	87,909
Net Position Held in Trust for Administrative Expenses	\$ 2,540,882	\$ 1,973,888

The notes to the financial statements are an integral part of this statement.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
ADMINISTRATIVE FUND**

**STATEMENTS OF CHANGES IN FIDUCIARY NET POSITION
YEARS ENDED SEPTEMBER 30, 2025 AND 2024**

	2025	2024
ADDITIONS		
Program Administrative Fees		
Administrative Fees	\$ 746,565	\$ 637,531
Maintenance and Enrollment Fees	16,868	17,424
ABLE Fees	351	-
Contributions	-	12,000
Net Investment Income	98,079	89,275
Total Additions	861,863	756,230
DEDUCTIONS		
Administrative Salaries	59,893	83,266
Professional Fees	220,976	212,673
Donations (Scholarships)	14,000	15,500
Total Deductions	294,869	311,439
Change in Net Position	566,994	444,791
Net Position Held in Trust for Administrative Expenses		
Beginning of Year	1,973,888	1,529,097
End of Year	\$ 2,540,882	\$ 1,973,888

The notes to the financial statements are an integral part of this statement.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 1 ORGANIZATION AND PURPOSE

The District of Columbia (DC) College Savings Program (the Program) was created by D.C. Law 47- 4501 et seq., as amended and pursuant to D.C. Regulations, 49 DCR 9859, November 1, 2002, made final at D.C. Mun. Regs, title 9 sec. 155 (2004), as a Trust of the District of Columbia Government (the District). The Program enables participants to save for qualified higher education expenses. On December 22, 2017, federal tax bill H.R.1 was signed into law and expanded the definition of “qualified higher education expenses” to include qualified K-12 tuition expenses at a private, public, or parochial school up to specified expense limitations per student. On December 20, 2019, the Setting Every Community Up for Retirement Enhancement Act (SECURE Act), H.R.1865, P.L. 116-94, was signed into law and expanded eligible expenses to include Apprenticeship Programs and Loan Repayments, which will not be subject to federal income tax.

The Chief Financial Officer of the District of Columbia or his/her designee is the Trustee of the Program. The current designee is the D.C. Treasurer. The Trustee is responsible for entering into contracts for program management services, adopting program administration rules and regulations, and establishing investment policies. The Program is managed by Ascensus College Savings Recordkeeping Services, LLC (ACSR) and its affiliates (collectively, Ascensus College Savings) which have overall responsibility for the day-to-day operation of the Program including recordkeeping, investment management, administrative services, and marketing. The management agreement between Ascensus College Savings and the D.C. Treasurer expires January 30, 2030, with the option to extend for two one-year periods, unless earlier termination.

The Program is available to both the District of Columbia and non-District of Columbia residents. It is a qualified tuition program that allows participants to make contributions into sixteen (16) and seventeen (17) different investment options for Program years 2025 and 2024, respectively. The account balance limit is \$500,000 per beneficiary. Accounts are subject to market investment risk, except for those that are invested in the Principal Protected Portfolio, which focuses on protecting the invested principal. As of September 30, 2025, and 2024, the Plan had 43,826 and 41,493 funded participant accounts with a net asset value of \$1,641,493,209 and \$1,416,155,826, respectively. Funded participant accounts have an account balance that is more than zero. Fees and expenses of the program are paid by each account owner and vary according to the Portfolio in which they are invested.

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Presentation

The accompanying financial statements have been prepared in accordance with accounting principles generally accepted in the United States of America as prescribed by the Governmental Accounting Standards Board (GASB).

Measurement Focus, Basis of Accounting and Financial Statement Presentation

The Program reports the activity of the District of Columbia College Savings Program as a private-purpose trust fund, which is a type of fiduciary fund. Private-purpose trust funds account for transactions of trust arrangements in which the principal and income benefit individuals, private organizations, or governments.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

The financial statements of the fiduciary funds are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recognized when incurred. Obligations for scholarships are recognized when claimed and the conditions for payment have been met.

Investment Valuation and Income Recognition

Portfolio investments in the underlying funds are valued at the closing net asset value per share (unit) of each underlying fund on the day of valuation. The stability of the Principal Protected Portfolio is valued in accordance with the terms of the funding agreement, inclusive of accrued interest.

Security transactions, normally in shares of the underlying funds, are accounted for on the trading date. Realized gains and losses are reported on the identified cost basis. Income and capital gains distributions, if any, from investments in the underlying funds are recorded on the ex-dividend date. Expenses included in the accompanying financial statements reflect the expenses of each portfolio and do not include any expenses associated with the underlying funds.

Units represent the beneficial interest of each participant in the net assets of a Portfolio. Contributions to and distributions from the portfolios are subject to terms and limitations defined in the Participation Agreement between the participant and the Trust. Contributions and distributions are recorded upon receipt of the participants' instructions in good order, based on the next determined net asset value per unit. Net investment income and realized and unrealized gains and losses accumulate in the net asset value of each Portfolio and are not separately distributed to participants.

Fair Value Measurements

Governmental Accounting Standards Board Statement No. 72 (GASB 72), *Fair Value Measurement and Application*, clarifies the definition of fair value for financial reporting, establishes a framework for measuring fair value, and requires additional disclosures about the use of fair value measurements. GASB 72 establishes a three-level valuation hierarchy for disclosure of fair value measurements. The valuation hierarchy is based upon the transparency of inputs to the valuation of an asset or liability as of the measurement date. The three levels are defined as follows:

Level 1 – observable market inputs that are unadjusted quoted prices for identical assets or liabilities in active markets that a government can access at the measurement date.

Level 2 – inputs other than quoted prices included within Level 1 – that are observable for the asset or liability, either directly or indirectly (for example, quoted prices for similar assets or liabilities in active markets).

Level 3 – unobservable inputs (including the District's own assumptions in determining the fair value of investments).

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
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NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Cash and Cash Equivalents

The balance includes cash on deposit and short-term highly liquid investments that are: (a) readily convertible to known amounts of cash and (b) so near their maturities that they present an insignificant risk of changes in value because of changes in interest rates.

Receivables and Payables for Investments Purchased and Sold

The receivables and payables represent transactions related to the purchase and sale of investments that have not settled as of the end of any given fiscal year.

Estimates

The preparation of the financial statements in accordance 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 at the date of the financial statements and the amounts of income and expense during the reporting period. Actual results could differ from those estimates.

Income Tax Status

The Program is exempt from federal taxes in accordance with Section 529 of the Internal Revenue Code. Under District of Columbia code section 47-4502, the Program “shall constitute an instrumentality of the District of Columbia” and as such, is not subject to taxation by the District. District resident participants are exempt from state and local taxes when earnings from the Program are used for qualified expenses. Non-District residents may be subject to state and local taxes in their jurisdiction.

Impact of New Accounting Standards

Governmental Accounting Standards Board Statement No. 101, *Compensated Absences*, updates the accounting and financial reporting guidance for employee leave benefits such as vacation and sick leave. It replaces GASB No. 16 and requires governments to recognize a liability for leave that is attributable to past service, can be carried forward, and is more likely than not to be used or paid. The liability should be measured based on the employee’s current pay rate, including related payroll costs. The new “more likely than not” threshold lowers the bar for recognition compared to the old “probable” standard, meaning some governments may record larger liabilities than before—especially for sick leave. The standard simplifies certain disclosures, removing the requirement to identify the funds used to liquidate the liability, and instead focuses on policies and balances. GASB No. 101 is effective for fiscal years beginning after December 15, 2023, with early adoption permitted. Management has assessed the impact of this statement on its financial reporting and disclosures and determined its requirements are not applicable to the Program’s standalone financial statements. The 529 Program has no employees within the fiduciary trust structure, and therefore no compensated absences arise. All employee-related leave benefits are accounted for in the District-wide government financial statements. The program’s fiduciary reporting focuses on participant assets and liabilities related to plan administration and investment activities, not payroll or employee benefit accruals.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
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SEPTEMBER 30, 2025 AND 2024**

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES *(Continued)*

Governmental Accounting Standards Board Statement No. 102, *Certain Risk Disclosures*, enhances transparency by requiring governments to disclose significant concentrations or constraints that make them vulnerable to substantial financial impacts. Concentration refers to reliance on limited revenue sources, employers, or suppliers, while constraints include statutory limits or externally imposed restrictions on resources. A disclosure is required only if the concentration or constraint is known, creates vulnerability to a substantial impact, and is associated with an event that has occurred or is more likely than not to occur within 12 months of the financial statement's issuance. The disclosures must describe the nature of the risk and any mitigating actions taken but do not affect measurement or recognition of amounts in the statements. GASB No. 102 is effective for fiscal years beginning after June 15, 2024, and early implementation is encouraged.

Management has assessed the impact of the implementation of GASB No. 102 on the financial statements and determined that there are no significant concentration, constraint, or vulnerability that would require disclosure under GASB Statement No. 102 for fiscal year 2025. The DC 529 Program's reliance on participants who are primarily DC residents could be viewed as a geographic concentration; however, participation levels and contributions have remained stable over time. Constraints arising from federal tax law, which governs 529 plans, are consistent and do not pose operational or financial risks. The Program's diversified investment structure and consistent participant funding reduce potential vulnerabilities.

NOTE 3 INVESTMENTS

Investment Policy and Guidelines

The Program offers account owners several investment portfolios that provide a range of risk and return characteristics, each unique to aid in proper diversification. Three different types of investment portfolios are offered to account owners: 1) Year of College Enrollment Portfolios, 2) Individual Portfolios, and 3) Principal Protected Portfolio. Once an account owner's investment portfolio(s) is selected for a particular contribution, Internal Revenue Service (IRS) guidance dictates the rules through which an account owner can move money or transfer from one investment portfolio to another; for fiscal years 2025 and 2024, it is twice per year.

The Year of College Enrollment Portfolios: The Year of College Enrollment Portfolios offer account owners pre-diversified Investment Portfolios that become more conservative as the beneficiary nears his/her intended year of high school graduation. The Year of College Enrollment Portfolios represent a weighted allocation among a predetermined number and type of investment strategies, as follows:

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
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NOTE 3 INVESTMENTS (Continued)

Underlying Investments	Year of College Enrollment Portfolios						
	DC College Savings Portfolios						
	In College	2028	2031	2034	2037	2040	2043
iShares Core International Aggregate Bond ETF	3.00%	5.70%	7.80%	6.56%	4.63%	3.08%	1.43%
iShares MSCI EAFE International Index	2.50%	5.00%	8.75%	12.50%	16.63%	19.60%	22.50%
Principal Protected Portfolio	70.00%	42.00%	13.00%	6.25%	2.63%	1.10%	0.50%
Schwab U.S. REIT ETF	0.50%	0.95%	1.67%	2.38%	3.17%	3.75%	4.50%
Vanguard Emerging Markets Stock Index	1.00%	2.00%	3.50%	5.00%	6.65%	7.85%	9.00%
Vanguard High-Yield Corporate Admiral	4.00%	7.60%	10.40%	8.75%	6.18%	4.10%	1.90%
Vanguard Short-Term Bond Index I	3.60%	6.84%	9.36%	7.88%	5.56%	3.69%	1.70%
Vanguard Short-Term Inflation Protected Securities	1.00%	1.90%	2.60%	2.19%	1.54%	1.03%	0.48%
Vanguard Total Bond Market II Index I	8.40%	15.96%	21.84%	18.38%	12.97%	8.61%	4.00%
Vanguard Total Stock Market Index Plus	6.00%	12.05%	21.08%	30.12%	40.06%	47.20%	54.00%

The Program Manager monitors and rebalances the underlying asset allocation of the Year of College Enrollment Portfolios on a quarterly basis. The Program Manager has the discretion to rebalance the Year of College Enrollment Portfolios when the Investment Portfolios fall outside the strategic targets by more than one percentage point.

Individual Portfolios: The Individual Portfolios are stand-alone options, which allow account owners to allocate their account into one or more Investment Portfolios. The goal in offering the Individual Portfolios is to provide account owners with the ability to construct diversified portfolios by asset class and investment style that match their risk tolerance, asset class preferences, time horizons and expected returns. Each portfolio invests 100% in a single underlying mutual fund or exchange-traded fund (ETF), as follows:

Individual Portfolios	Underlying Investments	Asset Class
U.S. Intermediate-Term Bond Index Portfolio	iShares Core U.S. Aggregate Bond ETF	Fixed Income
Intermediate-Term Bond Portfolio	Loomis Sayles Core Plus Bond Fund	Fixed Income
U.S. Total Stock Market Index Portfolio	iShares Core S&P Total U.S. Stock Market ETF	Domestic Equity
U.S. Socially Responsible Equity Portfolio	DFA U.S. Sustainability Core 1 Portfolio	Domestic Equity
U.S. Large-Cap Equity Portfolio	JP Morgan U.S. Equity Fund	Domestic Equity
Non-U.S. Socially Responsible Equity Portfolio	DFA International Sustainability Core 1 Portfolio	International Equity
Non-U.S. Total Stock Market Index Portfolio	iShares Core MSCI Total International Stock ETF	International Equity
U.S. Small-Cap Equity Portfolio	Vanguard Strategic Small-Cap Equity Fund	Domestic Equity

The Trustee reserves the right to add or replace Individual Portfolios based upon market conditions, Program Manager and Investment Consultant input, account owner response, or other factors.

Principal Protected Portfolio: The Principal Protected Portfolio focuses on protecting the principal account owners' investment by allocating account owner contributions and earnings to a funding agreement issued by an insurance company that provides a guaranteed return of principal plus a minimum annualized rate of interest to the Trust. As of September 30, 2025, and 2024, this portfolio was maintained in a stable value fund.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
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NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 3 INVESTMENTS (Continued)

Unrealized Appreciated / (Depreciated) Value of the Program's Investments

At September 30, 2025, the Program held the following investments, which are stated at fair value based on fair market prices:

	<u>Aggregate Cost</u>	<u>Aggregate Fair Value</u>	<u>Unrealized Appreciation (Depreciation)</u>
Domestic Equity Mutual Funds and ETFs			
DFA U.S. Sustainability Core 1 Portfolio	\$ 24,934,083	\$ 41,653,336	\$ 16,719,253
iShares Core S&P Total U.S. Stock Market ETF	288,366,345	394,434,056	106,067,711
JP Morgan U.S. Equity	87,627,019	132,744,370	45,117,351
Schwab U.S. REIT ETF	14,696,270	15,999,698	1,303,428
Vanguard Strategic Small Cap Equity	30,608,224	37,410,179	6,801,955
Vanguard Total Stock Market Index	161,999,326	225,390,203	63,390,877
International Equity Mutual Funds and ETFs			
DFA International Sustainability Core 1	11,074,391	15,255,920	4,181,529
iShares Core MSCI Total International Stock ETF	25,378,198	32,439,571	7,061,373
iShares MSCI EAFE International Index	73,728,525	92,026,393	18,297,868
Vanguard Emerging Market Stock Index	32,043,900	37,785,631	5,741,731
Fixed Income Mutual Funds and ETFs			
iShares Core U.S. Aggregate Bond Index ETF	18,174,231	17,534,728	(639,503)
iShares Core International Aggregate Bond	44,795,142	43,649,292	(1,145,850)
Loomis Sayles Core Plus Bond Fund	16,063,485	15,076,699	(986,786)
Vanguard High-Yield Corporate Admin	59,628,029	59,861,803	233,774
Vanguard Short-Term Bond Index	54,316,502	53,866,211	(450,291)
Vanguard Short-Term Inflation Protected Securities Index	13,839,253	14,058,158	218,905
Vanguard Total Bond Market II Index	134,201,880	127,689,774	(6,512,106)
Guaranteed Investment Contracts			
Principal Protected Portfolio	280,264,033	280,264,033	-
Total Investments	<u>\$ 1,371,738,836</u>	<u>\$ 1,637,140,055</u>	<u>\$ 265,401,219</u>

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 3 INVESTMENTS (Continued)

The net unrealized gain on investments as of September 30, 2025, was \$265,401,219. The net appreciation in the fair value of the investments as reflected in the Statement of Changes in Fiduciary Net Position consists of the following for the year ended September 30, 2025:

Unrealized gain as of September 30, 2025	\$ 265,401,219
Less: Unrealized gain as of September 30, 2024	<u>156,295,124</u>
Net change in unrealized gain during the year	109,106,095
Net realized gain during the year	<u>47,732,007</u>
Net appreciation in fair value of investments	<u>\$ 156,838,102</u>

The net appreciation or depreciation in the fair value of investments consists of net realized and net unrealized gains or losses during the period.

At September 30, 2024, the Program held the following investments, which are stated at fair value based on fair market prices:

	Aggregate Cost	Aggregate Fair Value	Unrealized Appreciation (Depreciation)
Domestic Equity Mutual Funds and ETFs			
DFA U.S. Sustainability Core 1 Portfolio	\$ 22,931,604	\$ 35,376,775	\$ 12,445,171
iShares Core S&P Total U.S. Stock Market ETF	289,491,566	345,876,971	56,385,405
JP Morgan U.S. Equity	77,157,986	113,324,856	36,166,870
Schwab U.S. REIT ETF	12,305,210	14,708,779	2,403,569
Vanguard Strategic Small Cap Equity	27,841,698	33,828,938	5,987,240
Vanguard Total Stock Market Index	154,588,035	190,893,628	36,305,593
International Equity Mutual Funds and ETFs			
DFA International Sustainability Core 1	9,686,508	12,152,219	2,465,711
iShares Core MSCI Total International Stock ETF	19,825,893	22,999,742	3,173,849
iShares MSCI EAFE International Index	70,712,697	79,500,414	8,787,717
Vanguard Emerging Market Stock Index	31,496,951	32,905,310	1,408,359
Fixed Income Mutual Funds and ETFs			
iShares Core International Aggregate Bond	14,925,377	14,346,178	(579,199)
iShares Core U.S. Aggregate Bond Index ETF	39,374,380	38,579,783	(794,597)
Loomis Sayles Core Plus Bond Fund	14,993,851	13,985,314	(1,008,537)
Vanguard High-Yield Corporate Admiral	52,831,075	52,565,503	(265,572)
Vanguard Short-Term Bond Index	47,853,733	47,242,333	(611,400)
Vanguard Short-Term Inflation Protected Securities Index	12,925,940	12,874,067	(51,873)
Vanguard Total Bond Market II Index	116,738,230	110,815,048	(5,923,182)
Guaranteed Investment Contracts			
Principal Protected Portfolio	241,137,564	241,137,564	-
Total Investments	<u>\$ 1,256,818,298</u>	<u>\$ 1,413,113,422</u>	<u>\$ 156,295,124</u>

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 3 INVESTMENTS (Continued)

The net unrealized gain on investments as of September 30, 2024, was \$156,295,124. The net appreciation in the fair value of the investments as reflected in the Statement of Changes in Fiduciary Net Position consists of the following for the year ended September 30, 2024:

Unrealized gain as of September 30, 2024	\$ 156,295,124
Less: Unrealized loss as of September 30, 2023	<u>(65,862,203)</u>
Net change in unrealized gain during the year	222,157,327
Net realized gain during the year	<u>22,370,422</u>
Net appreciation in fair value of investments	<u>\$ 244,527,749</u>

The net appreciation or depreciation in the fair value of investments consists of net realized and net unrealized gains or losses during the period.

Investment Risks

The Program’s investments are subject to the following risks common to investments:

Custodial Credit Risk is the risk that the Program 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 Program, and are held by either (a) the counterparty or (b) the counterparty’s trust department or agent, but not in the Program’s name.

The Program’s investments for fiscal year 2025 and 2024 are uninsured and unregistered, but are held by the counterparty in the Program’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 funds and exchange traded funds (ETF), which are not generally exposed to custodial credit risks.

Credit Risk is the risk that an issuer to an investment will not fulfill its obligations. The Program does not invest in debt securities that have an overall quality, which is less than the BBB as rated by Moody’s Investors Service, Inc. (“Moody’s”) and S&P Global (“S&P”). The primary credit ratings of the Program’s debt securities are as follows:

Fund	Credit Rating (S&P and Moody’s)	
	2025	2024
iShare Core International Aggregate Bond ETF	A, AA, AAA, BBB	A, AA, AAA, BBB
iShare Core U.S. Aggregate Bond ETF	AA, BBB, A, AAA	AA, BBB, A, AAA
Loomis Sayles Core Plus Bond Fund	AAA, AA, BBB, A	AAA, BBB, A, BB
Principal Protected Portfolio	BBB, A, AAA, AA	BBB, A, AAA, AA
Vanguard Total Bond Market II Index I	AAA, BBB, A, AA	AAA, BBB, A, AA
Vanguard Short -Term Corp Bd Index I	AAA, A, BBB, AA	AAA, A, BBB, AA
Vanguard Short-Term Treasury Inflation Protected Securities Index	AAA	AAA
Vanguard High-Yield Corporate Admiral	BB, B, AAA, AA	BB, B, AAA, BBB

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
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NOTE 3 INVESTMENTS (Continued)

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. The Program does not invest in any investment account that has an average maturity exceeding ten years for its Bond Mutual Funds. The interest rate sensitivity, defined as duration, for each fund is as follows:

Fund	Average Duration (in years)	
	2025	2024
iShare Core International Aggregate Bond ETF	6.59	6.79
iShare Core U.S. Aggregate Bond ETF	5.83	5.99
Loomis Sayles Core Plus Bond Fund	6.43	6.78
Principal Protected Portfolio	7.54	7.51
Vanguard High-Yield Corporate Admiral	2.81	3.03
Vanguard Short-Term Corp Bond Index I	2.64	2.63
Vanguard Short-Term Inflation - Protection Securities Index	2.45	2.51
Vanguard Total Bond Market II Index I	5.79	5.97

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 Program does not have a formal policy for limiting its exposure to changes in exchange rates.

The investment funds that invest primarily in foreign financial institutions are the DFA International Sustainability Core 1 Portfolio and iShares Core International Aggregate Bond ETF. The Fund has various currency denominations. The primary currency denominations are the Franc, the Yen, and the British Pound.

Fair Value Measurements

Equity Mutual Funds: Equity Mutual Funds consist of open-ended mutual funds that are registered with the Securities and Exchange Commission (SEC). The mutual funds held in equities are deemed to be actively traded and support classification of the fair value measurement as Level 1 in the fair value hierarchy.

Fixed Income Mutual Funds: Mutual funds are a pool of money invested by an investment company in a variety of instruments such as emerging markets sovereigns, government related agencies, and emerging markets corporations. This investment category consists of open-ended mutual funds that are registered with the SEC. The mutual funds are invested in high yield markets bonds that represent fixed income securities issued by corporations with credit ratings of AAA or lower. The mutual funds held in bonds are deemed to be actively traded and support the classification as Level 1 in the fair value hierarchy.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
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SEPTEMBER 30, 2025 AND 2024**

NOTE 3 INVESTMENTS (Continued)

Guaranteed Investment Contracts: The Guaranteed Investment Contract (GIC) is valued at the sum of the net cash contributions to the deposit account plus interest credited minus withdrawals (the Contract Value). The GIC is measured at fair value and is a contractual investment rather than a security and is not deemed to be subject to custodial credit risk. The determination of fair value includes certain unobservable inputs as well as the assessment of the projected long-term duration of the Insurance and Annuity Company through review of contract terms and substantiated utilizing available market data. However, there is a risk that an insurance company could fail to fulfill its obligations under a funding agreement for financial or other reasons. These contract values of the GIC are not leveled in the fair value hierarchy table below.

The Program categorizes fair value measurement within a hierarchy established by generally accepted accounting principles. The underlying funds had the following recurring fair value measurements at September 30, 2025:

	Total	Fair Value Measurement Using		
		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				
Domestic Equity Mutual Fund and ETFs				
DFA U.S. Sustainability Core 1 Portfolio	\$ 41,653,336	\$ 41,653,336	\$ -	\$ -
iShares Core S&P Total U.S. Stock Market ETF	394,434,056	394,434,056	-	-
JP Morgan U.S. Equity Fund	132,744,370	132,744,370	-	-
Schwab U.S. REIT ETF	15,999,698	15,999,698	-	-
Vanguard Strategic Small Cap Equity Fund	37,410,179	37,410,179	-	-
Vanguard Total Stock Market Index	225,390,203	225,390,203	-	-
Total Domestic Equity Mutual Funds and ETFs	847,631,842	847,631,842	-	-
International Equity Mutual Funds and ETFs				
DFA International Sustainability Core 1 Portfolio	15,255,920	15,255,920	-	-
iShares Core MSCI Total International Stock ETF	32,439,571	32,439,571	-	-
iShares MSCI EAFE International Index	92,026,393	92,026,393	-	-
Vanguard Emerging Market Stock Index	37,785,631	37,785,631	-	-
Total International Equity Mutual Funds and ETFs	177,507,515	177,507,515	-	-
Fixed Income Mutual Funds and ETFs				
iShares Core U.S. Aggregate Bond Index ETF	17,534,728	17,534,728	-	-
iShares Core International Aggregate Bond	43,649,292	43,649,292	-	-
Loomis Sayles Core Plus Bond Fund	15,076,699	15,076,699	-	-
Vanguard High-Yield Corporate Admiral	59,861,803	59,861,803	-	-
Vanguard Short-Term Bond Index	53,866,211	53,866,211	-	-
Vanguard Short-Term Inflation Protected Securities Index	14,058,158	14,058,158	-	-
Vanguard Total Bond Market II Index	127,689,774	127,689,774	-	-
Total Fixed Income Mutual Funds and ETFs	331,736,665	331,736,665	-	-
TOTAL INVESTMENTS MEASURED AT FAIR VALUE		\$ 1,356,876,022	\$ -	\$ -
INVESTMENT MEASURED AT CONTRACT VALUE				
Guaranteed Investment Contracts				
Principal Protected Portfolio	280,264,033			
TOTAL INVESTMENTS	\$ 1,637,140,055			

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
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SEPTEMBER 30, 2025 AND 2024**

NOTE 3 INVESTMENTS (Continued)

The Program categorizes fair value measurement within a hierarchy established by generally accepted accounting principles. The underlying funds had the following recurring fair value measurements at September 30, 2024.

	Total	Fair Value Measurement Using		
		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				
Domestic Equity Mutual Fund and ETFs				
DFA U.S. Sustainability Core 1 Portfolio	\$ 35,376,775	\$ 35,376,775	\$ -	\$ -
iShares Core S&P Total U.S. Stock Market ETF	345,876,971	345,876,971	-	-
JP Morgan U.S. Equity Fund	113,324,856	113,324,856	-	-
Schwab U.S. REIT ETF	14,708,779	14,708,779	-	-
Vanguard Strategic Small Cap Equity Fund	33,828,938	33,828,938	-	-
Vanguard Total Stock Market Index	190,893,628	190,893,628	-	-
Total Domestic Equity Mutual Funds and ETFs	734,009,947	734,009,947	-	-
International Equity Mutual Funds and ETFs				
DFA International Sustainability Core 1 Portfolio	12,152,219	12,152,219	-	-
iShares Core MSCI Total International Stock ETF	22,999,742	22,999,742	-	-
iShares MSCI EAFE International Index	79,500,414	79,500,414	-	-
Vanguard Emerging Market Stock Index	32,905,310	32,905,310	-	-
Total International Equity Mutual Funds and ETFs	147,557,685	147,557,685	-	-
Fixed Income Mutual Funds and ETFs				
iShares Core International Aggregate Bond	14,346,178	14,346,178	-	-
iShares Core U.S. Aggregate Bond Index ETF	38,579,783	38,579,783	-	-
Loomis Sayles Core Plus Bond Fund	13,985,314	13,985,314	-	-
Vanguard High-Yield Corporate Admiral	52,565,503	52,565,503	-	-
Vanguard Short-Term Bond Index	47,242,333	47,242,333	-	-
Vanguard Short-Term Inflation Protected Securities Index	12,874,067	12,874,067	-	-
Vanguard Total Bond Market II Index	110,815,048	110,815,048	-	-
Total Fixed Income Mutual Funds and ETFs	290,408,226	290,408,226	-	-
TOTAL INVESTMENTS MEASURED AT FAIR VALUE		\$ 1,171,975,858	\$ -	\$ -
INVESTMENT MEASURED AT CONTRACT VALUE				
Guaranteed Investment Contracts				
Principal Protected Portfolio	241,137,564			
TOTAL INVESTMENTS	\$ 1,413,113,422			

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 4 ADMINISTRATIVE AND MAINTENANCE FEES

The Program assessed underlying investment, program management, state fees and an annual maintenance fee. Effective February 1, 2025, program management and state fees (administrative fees) decreased to 0.10% of the Principal Protected Portfolio and 0.23% on all other funds. The annual maintenance fee is generally charged during the month of the first anniversary in which the account was opened and annually thereafter. Account owners who are residents of the District are charged an annual maintenance fee of \$10, and non-District residents are charged an annual maintenance fee of \$15. The annual maintenance fees are charged on a pro rata basis upon the closure of an account. The Program Manager receives the \$10 annual maintenance fee charged to District residents. Of the \$15 annual maintenance fee charged to non-District residents, the Program Manager receives \$10, and the District receives \$5.

For fiscal year 2025, total program management and administrative fees assessed to account owners were \$3,456,714 and \$746,565, respectively. These fees are reflected in the Participant Fund Statement of Changes in Fiduciary Net Position. The District portion of the fees was \$746,565, which is reflected in the Administrative Fund Statement of Changes in Fiduciary Net Position. As of September 30, 2025, the total amount earned during the fiscal year, but not remitted to the District was \$66,651.

For the fiscal year 2025, maintenance and enrollment fees reflected in the Participant Fund Statement of Changes in Fiduciary Net Position totaled \$245,871. The District's portion was \$16,867, which is reflected in the Administrative Fund Statement of Changes in Fiduciary Net Position. As of September 30, 2025, the total amount earned during the fiscal year, but not remitted to the District was \$740.

The District incurred administrative expenses of \$294,869 in fiscal year 2025, which is reflected in the Administrative Fund Statement of Changes in Fiduciary Net Position. The expenses incurred were for administrative salaries, professional fees and scholarship donations. As of September 30, 2025, the net position held in trust for administrative expenses was \$2,540,882.

For fiscal year 2024, total program management and administrative fees assessed to account owners were \$3,108,717 and \$637,531, respectively. These fees are reflected in the Participant Fund Statement of Changes in Fiduciary Net Position. The District portion of the fees was \$637,531, which is reflected in the Administrative Fund Statement of Changes in Fiduciary Net Position. As of September 30, 2024, the total amount earned during the fiscal year, but not remitted to the District was \$56,991.

For the fiscal year 2024, maintenance and enrollment fees reflected in the Participant Fund Statement of Changes in Fiduciary Net Position totaled \$239,704. The District's portion was \$17,424, which is reflected in the Administrative Fund Statement of Changes in Fiduciary Net Position. As of September 30, 2024, the total amount earned during the fiscal year, but not remitted to the District was \$1,099.

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
529 COLLEGE SAVINGS PROGRAM TRUST
NOTES TO FINANCIAL STATEMENTS
SEPTEMBER 30, 2025 AND 2024**

NOTE 4 ADMINISTRATIVE AND MAINTENANCE FEES (Continued)

The District incurred administrative expenses of \$311,439 in fiscal year 2024, which is reflected in the Administrative Fund Statement of Changes in Fiduciary Net Position. The expenses incurred were for administrative salaries, professional fees and scholarship donations. As of September 30, 2024, the net position held in trust for administrative expenses was \$1,973,888.

NOTE 5 INVESTMENT EXPENSES

Investment expenses represent the operating expenses and load fees paid to the broker dealers. Certain fees charged by the investment funds for operating expenses and load fees are reflected in the net appreciation in fair value of investments amount in the Statement of Changes in Fiduciary Net Position. Underlying investment fees, net of administrative and program management fees (see Note 4), ranged from 0.00% to 0.44% (gross of 0.15% to 0.74%) of the fund's average daily net asset value. Underlying investment management fees, net of administrative and program management fees, totaled \$1,167,501 and \$1,068,596 for fiscal year 2025 and 2024, respectively. The fees are reflected in the Participant Fund Statement of Changes in Fiduciary Net Position.

NOTE 6 RELATED PARTY TRANSACTIONS

All of the Program's individual portfolios invest in a single underlying mutual fund or ETF managed by a third-party investment manager. The Year of College Enrollment Portfolios have a set target allocation and are invested in multiple underlying mutual funds, ETFs as well as the Ameritas Funding Agreement.

Ascensus College Savings monitors and rebalances the underlying asset allocations of the Year of College Enrollment Portfolios on a quarterly basis. The Principal Protected Portfolio invests in a funding agreement issued by Ameritas Life.

NOTE 7 RISKS AND UNCERTAINTIES

The Program 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 Statement of Fiduciary Net Position.

NOTE 8 SUBSEQUENT EVENTS

The Program has evaluated events subsequent to September 30, 2025, and through December 12, 2025, the date the financial statements were available to be issued and determined there have not been any events that have occurred that would require adjustments to the financial statements.

**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*.**

To the Trustee of
The District of Columbia 529 College Savings Program Trust

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 District of Columbia 529 College Savings Program Participant and Administrative Funds (the "Trust"), as of and for the year ended September 30, 2025, and the related notes to the financial statements, which collectively comprise the Trust's basic financial statements, and have issued our report thereon dated December 12, 2025.

Internal Control Over Financial Reporting

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

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Trust'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 Trust's financial statements are free of 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 financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

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

This report is intended solely for the information and use of the Trustees and management and is not intended to be and should not be used by anyone other than these specified parties.

Washington, D.C. *Watson Rice LLP*
December 12, 2025

