GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF FINANCIAL OFFICER

DETERMINATION AND FINDINGS
FOR
CONTRACTOR'S RESPONSIBILITY

AGENCY: **Office of Finance and Treasury (OFT)**

CONTRACT NO: **CFOPD-27-C-008**

CONTRACTOR: **The Northern Trust Company**

CAPTION: **Master Trust Custodian Services**

1. AUTHORIZATION:

27 DCMR §§ 2200.2, 2200.4; D.C. Code §2-353.01

2. MINIMUM REQUIREMENTS:

The District of Columbia Office of the Chief Financial Officer (OCFO) has a requirement for a Contractor to provide Master Trust Custodian Services for the District of Columbia's Other Post-Employment Benefits Fund (Fund).

3. ESTIMATED REASONABLE COST:

The estimated contract total price is not to exceed $295,000.00.

4. FACTS WHICH JUSTIFY CONTRACTOR'S RESPONSIBILITY:

The contractor has:

(a) the financial resources adequate to perform the contract or the ability to obtain those resources;
(b) the ability to comply with the required or proposed delivery or performance schedule, taking into consideration all of its existing commercial and government contract commitments;
(c) a satisfactory performance record, as depicted in their past performance references;
(d) a satisfactory record of integrity and business ethics, as depicted in their past performance references;
(e) a satisfactory record of compliance with the law, including labor and civil rights laws and rules, the First Source Employment Agreement Act of 1984, effective

June 29, 1984 (D.C. Law 5-9; D.C. Official Code §§ 2-218.01 et seq.), the Small and Certified Business Enterprise Development and Assistance Act of 2005, as amended (D.C. Official Code §§ 2-218.01 et seq.), licensing, and tax laws;

(f) the necessary organization, experience, accounting, operational control, and technical skills, or the ability to obtain them;

(g) the necessary production equipment, construction equipment, technical equipment, and facilities, or the ability to obtain them;

(h) not exhibited a pattern of overcharging the District;

(i) no outstanding debt with the District or the federal government in a delinquent status of more than the greater of one thousand dollars ($1,000) or one percent (1%) of the contract value, up to twenty-five thousand dollars ($25,000); and

(j) the contractor is otherwise qualified and is eligible to receive an award under applicable laws and regulations.

5. CERTIFICATION BY THE CONTRACT SPECIALIST:

I hereby certify that the above findings are correct and complete to the best of my knowledge.

Andrea Simpson — October 28, 2026

Andrea Simpson
Contract Specialist

Date

DETERMINATION

Based on the above findings, it is hereby determined that the Contractor is responsible in accordance with the applicable regulations set forth above and award of the proposed contract with ***The Northern Trust Company*** is in the best interest of the Government of the District of Columbia.

October 30, 2026

Anthony A. Stover
Contracting Officer

Date