STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS (START PROGRAMS)

PRIVATE-PURPOSE TRUST FUNDS OF THE STATE OF LOUISIANA



FINANCIAL STATEMENT AUDIT FOR THE YEAR ENDED DECEMBER 31, 2020 ISSUED OCTOBER 18, 2021

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October 5, 2021

Independent Auditor's Report

BOARD OF DIRECTORS OF THE LOUISIANA TUITION TRUST AUTHORITY STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS STATE OF LOUISIANA Baton Rouge, Louisiana

Report on the Financial Statements

We have audited the accompanying financial statements of the fiduciary fund activities of the Student Tuition Assistance and Revenue Trust Programs (START Programs), private-purpose trust funds of the state of Louisiana, as of and for the year ended December 31, 2020, and the related notes to the financial statements, which collectively comprise the START Programs' basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

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

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether

due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

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

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the fiduciary fund activities of the START Programs as of December 31, 2020, and the changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matter

As discussed in note 1, the financial statements present only the activity of the START Programs and do not purport to, and do not, present fairly the financial position of the state of Louisiana as of December 31, 2020, and the changes in its financial position for the year then ended in conformity with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the Management's Discussion and Analysis on pages 5 through 7 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.

Supplementary Information

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the START Programs' basic financial statements. The accompanying supplementary information schedules, including the Combining Schedule of Fiduciary Net Position, the Combining Schedule of Changes in Fiduciary Net Position, and the Schedule of Investments on pages 24 through 28 are presented for purposes of additional analysis and are not a required part of the basic financial statements.

These schedules are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, these schedules are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated October 5, 2021, on our consideration of the START Programs' internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the START Programs' internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the START Programs' internal control over financial reporting and compliance.

Respectfully submitted,

Michael J. "Mike" Waguespack, CPA Legislative Auditor

CS:CR:RR:EFS:aa

START 2020

As management of the Student Tuition Assistance and Revenue Trust Programs (START Programs), we offer readers of the START Programs' financial statements this narrative overview and analysis of the financial activities of the START Programs for the year ended December 31, 2020. The START Programs are administered by the Louisiana Office of Student Financial Assistance, a Program under the Board of Regents, as directed by the Louisiana Tuition Trust Authority. The responsibility for selection of the START Programs' investments and the investment of the START Programs' funds rests with the State Treasurer.

FINANCIAL HIGHLIGHTS

- The assets of the START Programs exceeded its liabilities at the close of the most recent fiscal year by \$1,213,017,821 (net position amounts held in trust for participants).
- The START Programs' total net position increased by \$174,638,260, from \$1,038,379,561 on December 31, 2019, to \$1,213,017,821 on December 31, 2020.
- The number of accounts increased by 3,787, from 67,434 on December 31, 2019, to 71,221 on December 31, 2020.

OVERVIEW OF THE FINANCIAL STATEMENTS

This discussion and analysis is intended to serve as an introduction to the START Programs' basic financial statements. The START Programs' basic financial statements are comprised of three components: (1) Statement of Fiduciary Net Position, (2) Statement of Changes in Fiduciary Net Position, and (3) Notes to the Financial Statements. These financial statements include the activities of the START Programs' fixed and variable investments.

The **Statement of Fiduciary Net Position** presents information on all of the START Programs' assets and liabilities, with the difference between the two reported as net position – amount held in trust for the START Programs' participants. Over time, increases or decreases in net position may serve as a useful indicator of whether the financial position of the START Programs is improving or deteriorating.

The **Statement of Changes in Fiduciary Net Position** presents information showing how the START Programs' net position changed during the most recent calendar year. All changes in net position are reported as soon as the underlying event giving rise to the change occurs, regardless of the timing of related cash flows. Thus, revenues and expenses are reported in this statement for some items that will only result in cash flows in future periods (e.g., accrued interest receivable).

Notes to the Financial Statements. The accompanying notes provide additional information that is essential to a full understanding of the data provided in the basic financial statements.

Other Information. In addition to the basic financial statements and accompanying notes, this report also presents supplemental information that presents combining schedules of the START Programs' net position and changes in net position for the Louisiana Education Tuition and Savings Fund and the K12 Fund; as well as a schedule that lists and categorizes the investments held by the START Programs at the end of the year.

BASIC FINANCIAL ANALYSIS

As noted earlier, net position may serve over time as a useful indicator of an entity's financial position. In the case of the START Programs, assets exceeded liabilities by \$1,213,017,821 at the close of the most recent year, December 31, 2020. By far, the largest portion of the START Programs' net position (92%) reflects its investments at fair market value. The following is a comparison of the START Programs' net position to the prior year.

Table A-1Comparative Statement of Fiduciary Net Position
As of December 31, 2020, and 2019

	2020	2019
Assets:		
Cash	\$96,613,753	\$75,807,883
Investments at fair market value	1,117,816,852	964,996,194
Accrued interest receivable	387,654	279,069
Total Assets	1,214,818,259	1,041,083,146
Liabilities:		
Disbursements payable	1,800,438	2,703,585
Total Liabilities	1,800,438	2,703,585
Net Position - Amounts Held in Trust for START Program Participants	\$1,213,017,821	\$1,038,379,561

Changes in Net Position. Investment activities and participants' transactions increased the START Programs' net position by \$174,638,260. Key elements of the increase are as follows:

	2020	2019
Additions:		
Participant deposits	\$105,624,069	\$103,574,728
From investment activities:		
Interest and dividend income	53,087,633	24,213,404
Change in the fair value of investments	81,357,208	129,492,932
Total additions	240,068,910	257,281,064
Deductions:		
Participant distributions	(65,430,650)	(61,679,856)
Increase in net position	174,638,260	195,601,208
Net position, beginning of year	1,038,379,561	842,778,353
Net position, end of year	\$1,213,017,821	\$1,038,379,561

Table A-2Comparative Statement of Changes in Fiduciary Net PositionFor the Years Ended December 31, 2020, and 2019

ECONOMIC OUTLOOK

Indications are that contact with individuals through benefit fairs increases name recognition and knowledge of the programs. This, and the payroll deduction option, contributed to an increase in accounts.

Currently, 55% of the START Programs' accounts and 22% of its investments are invested in the Louisiana Principal Protection Fund, which has a guaranteed rate of return established by the State Treasurer which, for 2020, was 1.40%. As the capital markets improve, generally, the percentage of account owners investing in equities will continue to increase and the percentage investing in the Louisiana Principal Protection Option will decrease.

REQUESTS FOR INFORMATION

This financial report is designed to provide a general overview of the START Programs' finances for all those with an interest in the START Programs' finances. For questions concerning any of the information provided in this report or requests for additional financial information, please call the START office at (225) 219-1012 or toll free at (800) 259-5626 or access the START website, www.startsaving.la.gov.

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS STATE OF LOUISIANA FIDUCIARY FUND - PRIVATE-PURPOSE TRUST FUND

Statement of Fiduciary Net Position, December 31, 2020

ASSETS	
Cash (note 2)	\$96,613,753
Investments (note 3)	1,117,816,852
Interest receivable	387,654
TOTAL ASSETS	1,214,818,259
LIABILITIES	
Disbursements payable	1,800,438
TOTAL LIABILITIES	1,800,438
NET POSITION - AMOUNT HELD IN TRUST FOR START PARTICIPANTS	\$1,213,017,821

The accompanying notes are an integral part of this statement.

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS STATE OF LOUISIANA FIDUCIARY FUND - PRIVATE-PURPOSE TRUST FUND

Statement of Changes in Fiduciary Net Position For the Year Ended December 31, 2020

ADDITIONS	
Participant deposits	\$105,624,069
Investment income:	
Interest and dividends	53,087,633
Net increase in the fair value of investments	81,357,208
Total additions	240,068,910
DEDUCTIONS	
Disbursements to participants	(65,430,650)
Total deductions	(65,430,650)
Change in net position	174,638,260
NET POSITION, BEGINNING OF YEAR	1,038,379,561
NET POSITION, END OF YEAR	\$1,213,017,821

The accompanying notes are an integral part of this statement.

INTRODUCTION

The Louisiana Student Tuition Assistance and Revenue Trust Programs (START Programs) are private-purpose trust funds of the state of Louisiana created under the provisions of Louisiana Revised Statutes (R.S.) 17:3091 *et seq*. The START Programs are administered by the Louisiana Office of Student Financial Assistance (LOSFA) within the Louisiana Board of Regents (Board) and are governed by the Louisiana Tuition Trust Authority (LATTA). LATTA is comprised of 21 members, including all members of the Board, the commissioner of higher education, a representative of the banking community, the State Treasurer, a representative from the Louisiana House of Representatives, and a representative from the Louisiana Senate.

The START Programs consist of savings plans for both postsecondary education and kindergarten through grade twelve education.

The Postsecondary Education Savings Plan was created to help make education affordable and accessible to all residents of Louisiana, to encourage savings, and to enhance the ability of residents to obtain access to institutions of postsecondary education. The Postsecondary Education Savings Plan allows individuals to save for qualified higher education expenses for beneficiaries. To encourage college savings, the state of Louisiana matches a portion of an account owner's annual deposits and does not tax earnings in the Postsecondary Education Savings Plan when used to pay for qualified higher education expenses.

Qualified higher education expenses are:

- (1) tuition, fees, books, supplies, and equipment required for the enrollment or attendance of a designated beneficiary at an eligible educational institution;
- (2) room and board; and
- (3) expenses for special needs services in the case of a special needs beneficiary, which are incurred in connection with such enrollment or attendance.

The Kindergarten Through Grade Twelve Savings Plan (K12 Plan) was created to allow families to save for tuition expenses related to attendance at eligible Louisiana schools that provide kindergarten through twelfth-grade instruction. An eligible school is "a public or approved nonpublic elementary or secondary school in Louisiana that contains any of the grades kindergarten through twelve." Qualified expenses are considered the tuition for enrollment or attendance of a designated beneficiary at an eligible educational institution.

Both programs are qualified tuition programs under Section 529 of the Internal Revenue Code (IRC) of 1986, as amended. Participation in the START Programs is voluntary.

Under each program, an account owner may open only one account per beneficiary; however, multiple account owners may establish an account for one beneficiary. An account may be opened by an individual, a legal entity, or a custodian who meets the following requirements:

- Both the account owner and the beneficiary are United States citizens, permanent residents of the United States, and/or are lawfully residing in the United States and have valid Social Security numbers.
- Either the account owner or the beneficiary must be a Louisiana resident.
- Individual account owners must be at least 18 years old at the time the account is opened.
- An authorized representative of a legal entity must open the account in the name of the legal entity.
- Custodians for minors under the Uniform Transfers to Minors Act and custodians of minors appointed by courts of competent jurisdiction may open accounts in the name of the minor.

Account owners may withdraw their deposits at any time and for any purpose. If the withdrawal is not for qualified higher education expenses, the entire account balance must be withdrawn. Account owners who withdraw deposits for other than qualified higher education expenses are responsible for any resulting income tax liability.

The START Programs' disclosure statements and participation agreements can be obtained at the START Programs' website, <u>www.startsaving.la.gov</u>, or by calling the START Programs' office at (225) 219-1012 or toll free at (800) 259-5626.

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. BASIS OF PRESENTATION

The Governmental Accounting Standards Board (GASB) promulgates accounting principles generally accepted in the United States of America and reporting standards for state and local governments. These principles are found in the *Codification of Governmental Accounting and Financial Reporting Standards* published by GASB. The accompanying financial statements have been prepared in accordance with such principles.

B. REPORTING ENTITY

GASB Codification Section 2100 has defined the governmental reporting entity to be the state of Louisiana. The START Programs are private-purpose trust funds of the state of Louisiana. The activity of the postsecondary education savings plan is reported in the Louisiana Education Tuition and Savings Fund (LETSF) and the activity of the Kindergarten Through Grade Twelve Savings Plan is reported in the K12 Fund. The state exercises oversight responsibility and has accountability for fiscal matters as follows:

(1) LATTA's members include all members of the Board, the commissioner of higher education, a representative of the banking community, the State Treasurer, a representative from the Louisiana House of Representatives, and a representative from the Louisiana Senate; and (2) the state has control and exercises authority because the START Programs' are administered by LOSFA, a program under the Board.

The accompanying financial statements present information only as to the balances of the START Programs. Annually, the state of Louisiana issues basic financial statements, which include the activity contained in the accompanying financial statements. The financial statements are audited by the Legislative Auditor.

C. BASIS OF ACCOUNTING

The accounting and financial reporting treatment applied to a fund is determined by its measurement focus. The financial statements of the START Programs are prepared using the economic resources measurement focus and the accrual basis of accounting. Accordingly, additions are recognized when earned and deductions are recognized when incurred.

D. CASH AND INVESTMENTS

Cash represents amounts on deposit with the custodian, fiscal agent banks, and/or the investment advisors. Under state law, the START Programs may deposit funds with a fiscal agent bank organized under the laws of the state of Louisiana, the laws of any other state in the Union, or the laws of the United States. The START Programs provide broad guidelines for acceptable investments by authorizing any investments in which Louisiana public retirement boards are authorized by law to invest and by authorizing investment of up to 100% of deposits in equity securities, based on the investment options chosen by account owners. All deposits are invested on behalf of the program by the State Treasurer. The START Programs' permissible investments are limited to the investment options selected by the State Treasurer. The investments are stated at fair value based on actual value and quoted market values. The fair value of investments is determined on a business-day basis.

Deposits in fixed earnings investment options are invested by the State Treasurer, and deposits in variable earnings investment options are invested by the State Treasurer in one or more mutual funds managed by the Vanguard Group. Account holders own an interest in the investments held by the START Programs, but do not own shares of the underlying Vanguard funds.

The Postsecondary Education Savings Plan currently offers the following investment options:

• <u>Louisiana Principal Protection Fund</u> - 100% of deposits and interest earned thereon are invested in the Louisiana Fixed Return Investments portfolio

managed by the State Treasurer. The state guarantees the return of account owners' principal and interest earned thereon.

- <u>Age-Based Moderate Track Fund</u> Deposits are placed in the Vanguard LifeStrategy Moderate Growth Fund and automatically moved to the Vanguard LifeStrategy Conservative Growth Fund on the beneficiary's sixth birthday, then to the Vanguard LifeStrategy Income Fund on the beneficiary's eleventh birthday (each fund has a progressively more conservative asset allocation) and finally, when the beneficiary is 16, to the Principal Protection Fund.
- <u>Age-Based Growth Track Fund</u> Deposits are placed in the Vanguard LifeStrategy Growth Fund and automatically moved to the Vanguard LifeStrategy Moderate Growth Fund on the beneficiary's sixth birthday, then to the Vanguard LifeStrategy Conservative Growth Fund on the beneficiary's eleventh birthday (each fund has a progressively more conservative asset allocation) and finally, when the beneficiary is 16, to the Principal Protection Fund. This track is different from the Age-Based Moderate Track Fund in that the initial fund is less aggressive.
- <u>Age-Based Aggressive Track Fund</u> Deposits are placed in the Vanguard LifeStrategy Growth Fund and automatically moved to the Vanguard LifeStrategy Moderate Growth Fund on the beneficiary's ninth birthday, then to the Vanguard LifeStrategy Conservative Growth Fund on the beneficiary's thirteenth birthday (each fund has a progressively more conservative asset allocation) and finally, when the beneficiary is 16, to the Principal Protection Fund. This fund is different from the Age-Based Growth Track Fund in that the progressions take place when the beneficiary is older.
- <u>Vanguard Total World Stock Index Fund, Institutional Shares</u> Provides shareholders low-cost exposure to stock markets around the globe, including the United States, developed foreign markets, and emerging markets. In addition to stock market risk, the fund is also subject to currency risk and country risk. Long-term investors seeking global equity exposure who are comfortable with the volatility inherent in stock market investing may wish to consider this fund.
- Vanguard Institutional Total Stock Market Index Fund, Institutional Plus Shares - Seeks to track the performance of a benchmark index that measures the investment return of the overall stock market. Invests in large-, mid-, and small-cap stocks diversified across growth and value styles. Passively managed, using index sampling.
- <u>Vanguard Total International Stock Index Fund, Institutional Shares</u> This fund offers investors a low-cost way to gain equity exposure to both developed and emerging international economies. The fund tracks stock

markets all over the globe, with the exception of the United States. Because it invests in non-U.S. stocks, including those in developed and emerging markets, the fund can be more volatile than a domestic fund. Long-term investors who want to add a diversified international equity position to their portfolio might want to consider this fund as an option.

- <u>Vanguard Small-Cap Index Fund, Institutional Shares</u> This fund provides broad exposure to the small-capitalization U.S. equity market. The fund seeks to track an index of small-sized companies. One of the fund's primary risks is its focus on the small-cap arena, which is an often-volatile segment of the market. Investors looking to add a small-cap equity allocation to an already diversified portfolio may wish to consider this option.
- <u>Vanguard Mid-Cap Index Fund, Institutional Shares</u> This fund employs an indexing investment approach designed to track the performance of the CRSP US Mid Cap Index, a broadly diversified index of stocks of mid-size U.S. companies. The Fund attempts to replicate the target index by investing all, or substantially all, of its assets in the stocks that make up the index, holding each stock in approximately the same proportion as its weighting in the index.
- <u>Vanguard Large-Cap Index Fund, Institutional Shares</u> This fund seeks to track the investment performance of the CRSP US Large Cap Index, an unmanaged benchmark representing predominantly large U.S. firms. Using full replication, the portfolio holds each index stock in approximately the same proportion as its weighting in the index.

The K12 Plan currently offers the following investment options:

- <u>Vanguard Federal Money Market Fund</u> seeks to provide current income and preserve shareholders' principal investment by maintaining a share price of \$1. As such it is considered one of the most conservative investment options offered by Vanguard. Although the fund invests in short-term U.S. government securities, the amount of income that a shareholder may receive will be largely dependent on the current interest rate environment.
- <u>Vanguard Short-Term Bond Index Fund, Admiral Shares</u> diversified approach to bond investing, providing broad exposure to U.S. investmentgrade bonds with maturities from one to five years. Reflecting this goal, the fund invests about 30% of assets in corporate bonds and 70% in U.S. government bonds within that maturity range. A key risk of the fund is the fact that changes in interest rates can eventually lead to a decrease in income for the fund.
- <u>Vanguard Intermediate-Term Bond Index Fund, Admiral Shares</u> diversified approach to bond investing, providing broad exposure to U.S. investment-grade bonds with maturities from five to ten years. Reflecting

this goal, the fund invests about 50% of assets in corporate bonds and 50% in U.S. government bonds within that maturity range. Risks of the fund include the fact that changes in interest rates, both up and down, can affect the fund by resulting in lower bond prices or an eventual decrease in income for the fund.

- <u>Vanguard Institutional Total Stock Market Index Fund, Institutional Plus</u> <u>Shares</u> - designed to provide investors with exposure to the entire U.S. equity market, including small-, mid-, and large-cap growth and value stocks. The fund's key attributes are its low costs, broad diversification, and the potential for tax efficiency.
- <u>Vanguard Total International Stock Index Fund, Institutional Shares</u> offers investors a low-cost way to gain equity exposure to both developed and emerging international economies. The fund tracks stock markets all over the globe, with the exception of the United States. Because it invests in non-U.S. stocks, including those in developed and emerging markets, the fund can be more volatile than a domestic fund.

Account owners are allowed to redistribute their existing account balances over any and all funds, provided the percentages are in whole digits and the total of all percentages equal 100%. All existing funds are liquidated and the proceeds are used to purchase shares in the funds based on the account owner's instructions. Future deposits will be allocated according to the last distribution instructions received from the account owner, unless changed by the account owner. Account owners may change their investment selection(s) for each new deposit. Investment selections for deposits already made cannot be changed more than twice each calendar year.

E. ESTIMATES

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

2. DEPOSITS WITH FINANCIAL INSTITUTIONS

For reporting purposes, deposits with financial institutions consist of demand deposits and funds received from participants for investment in a zero-balance bank account. The START Programs' deposits are pooled with all deposits in the state of Louisiana's general fund and special funds, separately managed funds, state of Louisiana bond issue funds, et cetera, and are carried at cost.

As reflected on the Statement of Fiduciary Net Position (Statement A), the START Programs have deposits (cash) totaling \$96,613,753 at December 31, 2020. These deposits are held and controlled by the State Treasurer and are secured from risk by the State Treasurer through separate custodial agreements, and the risk disclosures required by accounting principles generally accepted in the United States of America are included within the state's basic financial statements. Cash on

deposit with the State Treasurer is invested in various instruments in the pooled investment account of the State Treasurer. The investments are not identifiable by fund.

Custodial credit risk is the risk that, in the event of a bank failure, the START Programs' deposits may not be recovered. Under state law, the START Programs' deposits must be secured by federal deposit insurance or similar federal security or the pledge of securities owned by the fiscal agent bank. The market value of the pledged securities plus the federal deposit insurance must at all times equal the amount on deposit with the fiscal agent bank. A quarterly review for uncollateralized funds is performed by the State Treasurer. In addition, the State Treasurer reviews the collateral at least monthly between the quarterly reviews and takes appropriate action as necessary to ensure collateral is sufficient for cash deposits.

3. INVESTMENTS

Investments of \$1,117,816,852, as presented on Statement A, are reported at fair value. The following table itemizes the investments, the range of maturity dates, and fair market value of investments at December 31, 2020, and the change in investments during the year.

		Investment Maturities (in Years)			_
		Less			
Investment Securities	Fair Value	than 1	1 to 5	6 to 10	>10
Corporate bonds	\$53,688,266		\$39,397,986	\$14,290,280	
Federal Home Loan Bank Bonds	19,222,250		9,220,550	10,001,700	
Federal Home Loan Mortgage					
Corporation Bonds	45,156,600		35,276,550	5,002,150	\$4,877,900
Federal National Mortgage					
Association Notes	31,182,060	\$12,046,800	14,115,810	5,019,450	
Federal Farm Credit Bank Bonds	29,509,710		15,559,450	13,950,260	
U.S. Treasury Notes	62,077,535	23,336,710	23,836,525	14,904,300	
Total Investment Securities	\$240,836,421	\$35,383,510	\$137,406,871	\$63,168,140	\$4,877,900
Vanguard Mutual Funds	\$876,980,431				
Total Investments	\$1,117,816,852				

Change in Investments - Fair Market Value			
Balance, beginning	\$964,996,194		
Add:			
Investment purchases	385,875,539		
Market value adjustment	81,357,208		
Total	467,232,747		
Less investment sales/redemptions	(314,412,089)		
Balance, ending	\$1,117,816,852		

Unrealized investment gains exceeded unrealized investment losses by \$81,357,208 at year-end. This net unrealized investment gain is reflected in the year-end investments since they are reported at fair market value.

For an investment, custodial credit risk is the risk that, in the event of the failure of the counterparty, the START Programs will not be able to recover the value of its investments or collateral securities that are in the possession of an outside party. The START Programs' investments are a part of the state's total investment portfolio. Funds invested in the Louisiana Principal Protection Option, are registered in the name of the state of Louisiana and are held in JP Morgan Chase Bank. The Vanguard Group manages funds invested in the START Programs' equity options.

Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. R.S. 17:3099 permits the START Programs to invest its funds in any investments in which public retirement boards are authorized by law to invest, provided that up to 100% of deposits to an account may be invested in equity securities when an account owner has selected an equity investment option and that such investments in equity securities shall not be included in any limitation on investment in equity securities. Ratings issued by Standard and Poor's, which indicate the level of credit risk for the START Programs' investments as of December 31, 2020, are in the table below. U.S. Treasury Notes totaling \$62,077,535 are not included in the table below since they are explicitly guaranteed by the U.S. government and are not exposed to credit risk.

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Rating	Fair Value
AAA	\$20,982,100
AA+	131,727,306
AA-	8,076,150
A+	8,382,520
А	5,456,810
BBB+	4,134,000
Total	\$178,758,886

Concentration of credit risk is the risk of loss attributed to the magnitude of an entity's investment in a single issuer. The START Programs' account owners have several options from which to choose for investment of their deposits. For the Postsecondary Education Savings Plan, these options range from 100% equity investments, which are not guaranteed by the state, to 100% invested in the Louisiana Principal Protection Option. (These deposits and the interest earned thereon are guaranteed by the state.) Investment options for the K12 Plan are limited to equity investments only. Investment options may be changed twice per calendar year. Account owners assume the risk associated with the option they select.

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. The State Treasury has no specific policies to limit interest rate risk for the START Programs' investments.

GASB Statement No. 72, *Fair Value Measurement and Application*, requires disclosures to be made about fair value measurements, the level of fair value hierarchy, and valuation techniques.

The fair value hierarchy categorizes the inputs to valuation techniques used to measure fair value into three levels:

- <u>Level 1 inputs</u> The valuation is based on quoted market prices for identical assets or liabilities traded in active markets;
- <u>Level 2 inputs</u> The valuation is based on quoted market prices for similar instruments traded in active markets, quoted prices for identical or similar instruments in markets that are not active, and inputs other than quoted prices that are observable for the asset or liability;
- <u>Level 3 inputs</u> The valuation is determined by using the best information available under the circumstances and might include the government's own data. In developing unobservable inputs, a government may begin with its own data but should adjust those data if (a) reasonably available information indicates that other market participants would use different data or (b) there is something particular to the government that is not available to other market participants.

The categorization of investments within the hierarchy is based upon the pricing transparency of the instrument and should not be perceived as the particular investment's risk.

Assets classified in Level 1 of the fair value hierarchy are valued directly from a predetermined primary external pricing vendor. Assets classified in Level 2 are subject to pricing by an alternative pricing source due to lack of information available by the primary vendor. Assets classified in Level 3, due to lack of an independent pricing source, are valued using an internal fair value as provided by the investment manager.

Fair values of assets measured on a recurring basis at December 31, 2020, are as follows:

	Fair Market Value	Quoted Prices In Active Markets for Identical Assets Level 1	Other Observable Inputs Level 2	Significant Unobservable Inputs Level 3
Debt securities:				
Corporate bonds	\$53,688,266		\$53,688,266	
Federal Home Loan Bank Bonds	19,222,250		19,222,250	
Federal Home Loan Mortgage Corporation Bonds	45,156,600		45,156,600	
Federal National Mortgage Association Notes	31,182,060		31,182,060	
Federal Farm Credit Bank Bonds	29,509,710		29,509,710	
U.S. Treasury Notes	62,077,535		62,077,535	
Total Debt Securities	240,836,421	NONE	240,836,421	NONE
Equity Securities:				
Vanguard Mutual Funds	876,980,431	\$876,980,431		
Total Investments	\$1,117,816,852	\$876,980,431	\$240,836,421	NONE

Fair values for investments categorized in Level 2 have been obtained from the State Treasury, which obtains fair values from various external sources and are based on other observable inputs.

4. **SECURITIES LENDING**

As explained in note 1D, the State Treasurer manages the START Programs' investments. In accordance with its authority under R.S. 49:321.1, the State Treasurer (on behalf of the state of Louisiana) has entered into a securities lending agreement that functions as a reverse repurchase/repurchase arrangement, with Morgan Stanley acting as principal. Under the arrangement, Morgan Stanley purchases (or borrows) on an overnight basis that portion of the state's pool of U.S. Treasury and Agency securities, which the state from time to time makes available for such purposes, with a simultaneous agreement to resell or repurchase such securities at the termination of the transaction. The reverse repurchases and repurchase transactions are executed pursuant to the terms of a paired repurchase agreement among the state and Morgan Stanley, with the Bank of New York acting as an independent third-party custodian. The state receives U.S. Government Sponsored Entity, or "agency," collateral in addition to other eligible security collateral in return for the securities that it reverses to Morgan Stanley under the terms of the reverse repurchase transaction on a fixed-spread basis.

In each transaction, Morgan Stanley delivers collateral from its account at the Bank of New York to the state's custodial account at the Bank of New York. The Bank of New York monitors the movement of the collateral to ensure it is sufficient (equal to at least 102% of the value of the securities borrowed) and in compliance with the terms of the reverse repurchase/repurchase agreement. The market value principal of the repurchase transaction can be modified on any given day for purchased, sold, or matured securities. Morgan Stanley then receives any excess collateral, or delivers additional collateral, against the new principal market value of the state's investment securities on loan through the repurchase transaction. During the term of any particular transaction, the state's right to receive or sell the collateral is determined pursuant to the terms of the repurchase agreement, which provides for such rights upon borrower default, and in accordance with other applicable state and federal laws. The state has experienced no losses on securities lending transactions, and loss indemnification is provided in the contract with Morgan Stanley.

The Postsecondary Education Savings Plan's U.S. Government securities are included in the State Treasurer's securities lending program. At December 31, 2020, the fair market value of the Postsecondary Education Savings Plan's securities on loan totaled \$19,641,080, and the fair market value of the collateral totaled \$20,033,902. The Postsecondary Education Savings Plan had limited credit risk exposure because the value of the collateral securities pledged exceeded the value of the securities on loan by \$392,822.

5. INVESTMENT INCOME

Investment income is recognized when earned using the full accrual method of accounting. The investments in the START Programs are stated at fair value based on quoted market rates, and any increases or decreases are reported as net increase (decrease) in the fair value of investments. The fair value of investments is determined on a business-day basis.

Interest is calculated on a daily basis and is credited to accounts and reported to account owners after the conclusion of the calendar year in which the interest was earned. For purposes of determining account owners' shares sold and redeemed, and for financial statement purposes, investments are valued and reported at fair market value, respectively. Realized gains/losses are a part of investment income.

The START Programs' objectives include providing safety of principal and daily liquidity with a competitive rate of return to account owners by pooling monies. The following table shows the START Programs' annual return for the one-year, three-year, and five-year periods ended December 31, 2020:

	Average Annual Return		eturn
	One	Three	Five
Portfolio	Year	Years	Years
Postsecondary Education Savings Plan Investments:			
Vanguard:			
LifeStrategy Moderate Growth Fund	13.59%	8.84%	9.71%
LifeStrategy Conservative Growth Fund	11.51%	7.78%	8.03%
LifeStrategy Income Fund	9.13%	6.56%	6.24%
LifeStrategy Growth Fund	15.45%	9.79%	11.32%
Total World Stock Index Fund, Institutional Shares	16.72%	10.16%	12.55%
Institutional Total Stock Market Index Fund, Institutional Plus Shares	20.99%	14.53%	15.46%
Total International Stock Index Fund, Institutional Shares	11.28%	5.01%	9.11%
Small-Cap Index Fund, Institutional Shares	19.12%	11.23%	13.61%
Mid-Cap Index Fund, Institutional Shares	18.26%	12.04%	13.29%
Large-Cap Index Fund, Institutional Shares	21.05%	14.97%	15.67%
Louisiana Fixed Return Investments (Louisiana Principal			
Protection Fund)	1.40%	1.78%	1.72%
K12 Plan Investments:			
Vanguard:			
Federal Money Market Fund	0.45%	1.46%	1.10%
Short-Term Bond Index Fund, Admiral Shares	4.69%	3.62%	2.70%
Intermediate-Term Bond Index Fund, Admiral Shares	9.80%	6.49%	5.22%
Institutional Total Stock Market Index Fund, Institutional Plus Shares	20.99%	14.53%	15.46%
Total International Stock Index Fund, Institutional Shares	11.28%	5.01%	9.11%

6. SAVINGS ENHANCEMENT FUND

R.S. 17:3129.4(C) established the Savings Enhancement Fund to receive funds appropriated by the legislature or donated from any other source for the purpose of funding earnings enhancements. Earnings enhancements are annually appropriated by the legislature and represent payments credited to a Postsecondary Education Savings Plan account to help offset the beneficiary's qualified higher education expenses. The amount of the earnings enhancements credited to an account is based on the account owner's annual income and annual deposits of principal. Earnings enhancements and the interest earned thereon may only be disbursed for qualified higher education expenses and may not be refunded to the account owner if an account is closed. Earnings

enhancements appropriated by the Legislature to the Postsecondary Education Savings Plan for the state's fiscal year ending June 30, 2021, totaled \$2,900,000. The activity of the savings enhancement fund is recorded in the state of Louisiana's General Fund. This activity is not reported in the START Programs' fiduciary fund financial statements. The K12 Plan does not receive earnings enhancements.

7. ADMINISTRATIVE CHARGES

The Vanguard Group charges investment fees to the START Programs for the funds it manages and invests. These investment fees vary for each mutual fund and are subject to change at any time without notice. Earnings credited to the accounts invested in Vanguard mutual funds are net of these investment fees. For 2020, the maximum fee charged was 0.14% for the Postsecondary Education Savings Plan's mutual funds and 0.11% for the K12 Plan's mutual funds. Costs incurred by LATTA, LOSFA, and the State Treasurer to administer the START Programs are paid by those agencies and are not charged to the accounts.

8. COVID-19

Beginning in the spring 2020, LOSFA's delivery of services was impacted because of the stay-athome and social distancing measures orders associated with the COVID-19 public health emergency. COVID-19 is a respiratory illness caused by a novel strain of the coronavirus which began infecting United States citizens in the beginning of 2020. The continued spread of COVID-19 and the stay-at-home and social distancing orders of Federal, State and Local government authorities continued to impact LOSFA after year end. The effects these orders had on contributions, disbursements, investment earnings and market impact cannot be determined. While this did not affect the financial statements of the START programs, LOSFA will continue to monitor any future impacts caused by COVID-19.

SUPPLEMENTAL INFORMATION SCHEDULES

Combining Schedule of Fiduciary Net Position, December 31, 2020

Schedule 1 presents the Combining Schedule of Fiduciary Net Position for the Louisiana Education Tuition and Savings Fund and the K12 Fund.

Combining Schedule of Changes in Fiduciary Net Position, for the Year Ended December 31, 2020

Schedule 2 presents the Combining Schedule of Changes in Fiduciary Net Position for the Louisiana Education Tuition and Savings Fund and the K12 Fund.

Schedule of Investments, December 31, 2020

Schedule 3 presents the face amount, maturity date, and yield (where applicable), and the fair value of investments held by the START Programs at December 31, 2020.

Schedule 1

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS STATE OF LOUISIANA FIDUCIARY FUND - PRIVATE-PURPOSE TRUST FUND

Combining Schedule of Fiduciary Net Position, December 31, 2020

	LOUISIANA EDUCATION TUITION AND SAVINGS FUND	K12 FUND	TOTAL
ASSETS			
Cash	\$96,613,753		\$96,613,753
Investments	1,111,830,771	\$5,986,081	1,117,816,852
Interest receivable	387,654		387,654
TOTAL ASSETS	1,208,832,178	5,986,081	1,214,818,259
LIABILITIES			
Disbursements payable	1,641,026	159,412	1,800,438
TOTAL LIABILITIES	1,641,026	159,412	1,800,438
NET POSITION - AMOUNTS HELD IN TRUST FOR			
START PARTICIPANTS	\$1,207,191,152	\$5,826,669	\$1,213,017,821

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS STATE OF LOUISIANA FIDUCIARY FUND - PRIVATE-PURPOSE TRUST FUND

Combining Schedule of Changes in Fiduciary Net Position For the Year Ended December 31, 2020

	LOUISIANA EDUCATION TUITION AND SAVINGS FUND	K12 FUND	TOTAL
ADDITIONS			
Participant deposits	\$100,836,599	\$4,787,470	\$105,624,069
Investment income:			
Interest and dividends	52,710,817	376,816	53,087,633
Net increase in the fair value			
of investments	80,969,869	387,339	81,357,208
Total additions	234,517,285	5,551,625	240,068,910
DEDUCTIONS			
Disbursements to participants	(63,448,819)	(1,981,831)	(65,430,650)
CHANGE IN NET POSITION	171,068,466	3,569,794	174,638,260
NET POSITION, BEGINNING OF YEAR	1,036,122,686	2,256,875	1,038,379,561
NET POSITION, END OF YEAR	\$1,207,191,152	\$5,826,669	\$1,213,017,821

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAMS STATE OF LOUISIANA Schedule of Investments, December 31, 2020

FACE AMOUNT	DESCRIPTION	MATURITY DATE	COUPON RATE	FAIR VALUE			
POSTSECONDARY EDUCATION SAVINGS PLAN FIXED EARNINGS INVESTMENTS							
Corporate Securitie	es:						
\$3,000,000	3M Co.	02/14/25	2.000%	\$3,180,180			
4,000,000	3M Co.	06/26/22	2.000%	4,100,080			
1,600,000	Apple, Inc.	05/11/22	2.300%	1,644,416			
2,000,000	Walt Disney Co.	08/30/24	1.750%	2,085,760			
3,000,000	Honeywell International Inc.	08/15/24	2.300%	3,196,890			
2,000,000	International Business Machines Corp.	05/15/26	3.300%	2,259,920			
5,000,000	Johnson & Johnson	09/01/27	0.950%	5,024,800			
2,000,000	McDonald's Corp.	01/15/22	2.625%	2,048,240			
5,000,000	Microsoft Corp.	11/03/25	3.125%	5,589,700			
10,000,000	Microsoft Corp.	11/15/22	2.125%	10,367,600			
3,000,000	Proctor & Gamble Co.	02/06/22	2.300%	3,069,450			
5,000,000	Proctor & Gamble Co.	10/29/30	1.200%	5,006,700			
3,000,000	Apple, Inc.	08/20/25	0.550%	3,013,410			
2,000,000	Alphabet, Inc.	08/15/27	0.800%	1,998,860			
1,000,000	Coca-Cola Co.	03/25/25	2.950%	1,102,260			
\$51,600,000	Total Corporate Securities			\$53,688,266			
Federal Agency Bo	nds and Notes:						
Federal Farm Credit	Bank:						
\$10,000,000		01/13/26	2.070%	\$10,005,100			
4,000,000		06/24/30	1.150%	3,945,160			
10,000,000		10/16/24	1.500%	10,450,900			
5,000,000		10/11/22	1.375%	5,108,550			
\$29,000,000	Total Federal Farm Credit Bank Bonds			\$29,509,710			
Federal Home Loan	Bank:						
\$4,000,000		08/15/24	1.500%	\$4,190,200			
5,000,000		06/13/25	0.500%	5,030,350			
5,000,000		06/04/27	1.070%	5,000,050			
5,000,000		06/25/27	1.000%	5,001,650			
\$19,000,000	Total Federal Home Loan Bank Bonds			\$19,222,250			

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAM STATE OF LOUISIANA Schedule of Investments, December 31, 2020

FACE AMOUNT	DESCRIPTION	MATURITY DATE	COUPON RATE	FAIR VALUE
POSTSECONDAR	RY EDUCATION SAVINGS PLAN F	IXED EARNINGS IN	VESTMENTS (C	Continued)
Federal National Mo	ortgage Association:			
\$12,000,000		05/06/21	1.250%	\$12,046,800
8,500,000		02/05/24	2.500%	9,104,010
5,000,000		10/08/27	0.750%	5,019,450
5,000,000		05/22/23	0.250%	5,011,800
\$30,500,000	Federal National Mortgage Associati	on Notes		\$31,182,060
Federal Home Loan	Mortgage Corporation:			
\$5,000,000		11/06/23	0.250%	\$5,004,250
5,000,000		05/28/25	0.750%	5,002,550
5,000,000		07/21/25	0.375%	5,002,650
5,000,000		12/07/29	1.100%	5,002,150
5,000,000		10/19/32	1.320%	4,877,900
10,000,000		06/26/23	0.250%	10,021,700
5,000,000		06/17/24	0.500%	5,000,250
5,000,000		02/12/25	1.500%	5,245,150
\$45,000,000	Total Federal Home Loan Mortgage Corporation Bonds			\$45,156,600
U. S. Treasury Notes	S:			
\$5,000,000		06/30/21	1.625%	\$5,037,100
5,000,000		10/15/21	2.875%	5,107,600
13,000,000		11/30/21	1.750%	13,192,010
5,000,000		06/30/22	0.125%	5,000,800
8,500,000		05/15/23	1.750%	8,823,425
5,000,000		12/15/23	0.125%	4,994,150
5,000,000		04/30/25	0.375%	5,018,150
5,000,000		04/30/27	0.500%	4,987,500
5,000,000		05/31/27	0.500%	4,982,400
5,000,000		07/31/27	0.375%	4,934,400
\$61,500,000	Total U. S. Treasury Notes			\$62,077,535
\$236,600,000	Total Postsecondary Education Savir	ngs Plan Fixed Earnings	Investments	\$240,836,421

STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAM STATE OF LOUISIANA Schedule of Investments, December 31, 2020

FACE AMOUNT	DESCRIPTION	MATURITY DATE	COUPON RATE	FAIR VALUE			
POSTSECONDARY EDUCATION SAVINGS PLAN VARIABLE EARNINGS INVESTMENTS							
The Vanguard Group	o (Mutual Funds):						
Institutional Total Stock Market Index Fund Institutional Plus Shares			\$330,830,340				
	Large-Cap Index Fund, Institutional Shares			69,713,680			
	LifeStrategy Conservative Growth			81,303,564			
	LifeStrategy Growth			83,009,502			
	LifeStrategy Income			83,019,880			
	LifeStrategy Moderate Growth			93,810,480			
	Mid-Cap Index Fund, Institutional Shares			40,257,806			
	Small-Cap Index Fund, Institutional Shares			39,278,258			
Total International Stock Index Fund Institutional Shares			30,651,382				
	Total World Stock Index Fund, Institutiona	l Shares		19,119,458			
	Total Postsecondary Education Sav	vings Vanguard N	Iutual Funds	\$870,994,350			
Total Postsecondary Education Savings Investments			\$ 1,111,830,771				
K12 PLAN VARIABLE EARNINGS INVESTMENTS							
The Vanguard Group	(Mutual Funds):						
The Funguard Group	Federal Money Market Fund			\$755,767			
	Intermediate-Term Bond Index Fund, Adm	iral Shares		828,533			
	Institutional Total Stock Market Index Fund		s Shares	3,193,450			
	Short-Term Bond Index Fund, Admiral Sha			539,394			
	Total International Stock Index Fund, Instit	utional Shares		668,937			
	\$5,986,081						
		Total K12 Pla	n Investments	\$5,986,081			
	Total Postsecondary Education Savings I	Plan and K12 Pla	n Investments	\$1,117,816,852			

OTHER REPORT REQUIRED BY GOVERNMENT AUDITING STANDARDS

Exhibit A

The following pages contain a report on internal control over financial reporting and on compliance with laws and regulations and other matters as required by *Government Auditing Standards* issued by the Comptroller General of the United States. This report is based solely on the audit of the financial statements and includes, where appropriate, any significant deficiencies and/or material weaknesses in internal control or compliance and other matters that would be material to the presented financial statements.



October 5, 2021

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*

Independent Auditor's Report

BOARD OF DIRECTORS OF THE LOUISIANA TUITION TRUST AUTHORITY STUDENT TUITION ASSISTANCE AND REVENUE TRUST PROGRAM STATE OF LOUISIANA Baton Rouge, Louisiana

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 fiduciary fund activities of the Student Tuition Assistance and Revenue Trust Programs (START Programs), private-purpose trust funds of the state of Louisiana, as of and for the year ended December 31, 2020, and the related notes to the financial statements, which collectively comprise the START Programs' basic financial statements, and have issued our report thereon dated October 5, 2021. Our report was modified to include an emphasis of matter paragraph regarding financial statement comparability.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the START Programs' internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the START Programs' internal control. Accordingly, we do not express an opinion on the effectiveness of the START Programs' 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 entity'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 START Programs' financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, and contracts, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity'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 entity's internal control and compliance. Accordingly, this report is not suitable for any other purpose. Under Louisiana Revised Statute 24:513, this report is distributed by the Legislative Auditor as a public document.

Respectfully submitted,

Michael J. "Mike" Waguespack, CPA Legislative Auditor

CS:CR:RR:EFS:aa

START 2020