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**LOUISIANA PUBLIC FACILITIES AUTHORITY**  
**2011A TAXABLE STUDENT LOAN BACKED BOND PROGRAM AND SUPER**  
**TOP TRUST ORIGATION PROGRAM**

**AGREED UPON PROCEDURES REPORT**

**FOR THE YEAR ENDED DECEMBER 31, 2019**

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Postlethwaite & Netterville

A Professional Accounting Corporation

[www.pncpa.com](http://www.pncpa.com)

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A Professional Accounting Corporation

## INDEPENDENT ACCOUNTANTS' REPORT

To the Board of Trustees  
Louisiana Public Facilities Authority  
2011 Student Loan Revenue Bond Program  
Baton Rouge, Louisiana

We have performed the procedures described in Exhibit A, which were agreed to by Louisiana Public Facilities Authority and the U.S. Department of Education, as set forth in the *Federal Family Education Loan Program (FFEL Program) Lender Compliance Attestation Engagement Guide*. We performed the procedures solely to assist the specified parties in evaluating Louisiana Public Facilities Authority's compliance with certain U.S. Department of Education requirements applicable to Louisiana Public Facilities Authority's 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's participation in the FFEL Program during the year ended December 31, 2019.

Louisiana Public Facilities Authority's management is responsible for compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with the attestation standards established by the American Institute of Certified Public Accountants and applicable standards contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. The sufficiency of the procedures is solely the responsibility of the U.S. Department of Education and the management of Louisiana Public Facilities Authority. Consequently, we make no representation regarding the sufficiency of the procedures described in Exhibit A either for the purpose for which this report has been requested or for any other purpose. Our procedures and findings are described in Exhibit A.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on compliance with *The Lender Compliance Attestation Engagement Guide*. Accordingly, we do not express such an opinion. Had we performed other procedures, other matters might have come to our attention that would have been included in this report. Our procedures do not provide a legal determination of the Louisiana Public Facilities Authority's 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's compliance with the specified requirements.

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

*Postlethwaite & Netterville*

Baton Rouge, Louisiana  
June 24, 2020

**EXHIBIT A**

**PROCEDURES AND FINDINGS**

<b>Agreed-Upon Procedures</b>	<b>Results</b>
<b>4.3 Compilation Of The Lender's Interest and Special Allowance Request and Report (LaRS)</b>	
<u>If the Lender Servicer Prepares The LaRS Form:</u>  (1) Obtain the lender servicer contract(s), read and review to determine if it contains a provision to prepare the LaRS form for the lender.	Lender Servicers contracts contain provisions to prepare the LaRS form for the lender.
(2) Select 2 of the lender servicer's billings to the lender for each Lender ID and determine whether the billing included a servicer-prepared LaRS form.	P&N noted that there was no separate line item on the billings to prepare the LaRS form. P&N obtained written representation from the lender servicers that the LaRS form preparation was included and billed as part of the monthly servicing fees.
(3) Not applicable for this schedule	
<b>4.4 Lender Servicer Engagement Report</b>	
(1) Obtain and review all lender servicer(s) engagement report(s) obtained by the lender to satisfy the alternative engagement approach and ascertain that the report(s):  (a) Includes a statement that the engagement was conducted in accordance with <i>Government Auditing Standards</i> and expresses an opinion on compliance with specified compliance requirements identified in Section III of the <i>FFEL Program Lender Compliance Attestation Engagement Guide</i> that pertain to the functions carried out by the Service organization;  (b) Sets forth the scope of the engagement (organization-wide or limited to certain lenders);  (c) Covers the same length of period as the lender's reporting period (generally 12 months) ending within 6 months of the end of the lender's reporting period;	The lender servicers engagement reports met the requirements of Section 4.4 (1) (a)-(f) of the <i>Lender Compliance Attestation Engagement Guide</i> .

Agreed-Upon Procedures	Results
<b>4.4 Lender Servicer Engagement Report (continued)</b>	
<p>(d) Identifies what lenders, functions, and compliance requirements are covered by the engagement report;</p> <p>(e) Discloses whether the findings address the FFEL Program compliance requirement functions for which the lender has contracted the lender servicer to perform; and</p> <p>(f) The “Schedule of Findings” contains all required attributes and elements as discussed in Section 5.2 of the <i>FFEL Program Lender Compliance Attestation Engagement Guide</i>.</p> <p>(g) Not applicable for this schedule.</p>	
<b>4.5 Lender Servicer Engagement Report Findings</b>	
(1) Not applicable for this schedule	
(2) Using the lender service engagement report(s) obtained in Step 4.3(C)(2), determine if there are findings of noncompliance for any compliance functions for which the lender has contracted with the lender servicer(s) to perform.	No findings of noncompliance reported for compliance functions performed by the Lender Servicers.
(3) Not applicable for this schedule.	

## **INFORMATION SHEET**

### **Lender Information**

Lender Name: Louisiana Public Facilities Authority 2011A Taxable Student Loan  
Backed Bond Program and Super Top Trust Origination Program  
Lender I.D. Number: 805178 and 805149  
Telephone Number: (225) 923-0020  
Fax No.: (225) 923-0021  
President: James W. Parks II  
Name of Contact: Amy Tuminello, Accountant

### **Lender Servicer Information**

Lender Servicer: Nelnet Loan Services (services 805178)  
Lender Servicer I.D. Number: 700121  
  
Lender Servicers: Educational Services of America d/b/a EdFinancial Services  
(services 805149 and 805178)  
Lender Servicer I.D. Number: 700129

### **Audit Firm Information**

Type of Engagement: Alternative  
Partner in Charge: Amanda Strebeck  
Email Address: [astrebeck@pncpa.com](mailto:astrebeck@pncpa.com)  
State in Which Licensed: Louisiana  
CPA License Number: CPA.25921  
CPA Firm's Name: Postlethwaite & Netterville, APAC  
Address: 8550 United Plaza Blvd, Suite 1001  
Baton Rouge, LA 70809  
Telephone No.: (225) 922-4600  
Fax No.: (225) 922-4611



**MANAGEMENT'S ASSERTIONS REGARDING COMPLIANCE  
WITH THE SPECIFIED COMPLIANCE REQUIREMENTS  
INCLUDED IN THE LENDER SERVICER FINANCIAL  
STATEMENT AUDIT AND COMPLIANCE ATTESTATION  
GUIDE ISSUED BY THE U.S. DEPARTMENT OF  
EDUCATION, OFFICE OF INSPECTOR GENERAL  
AND  
INDEPENDENT ACCOUNTANT'S REPORT**

**FOR THE YEAR:  
JANUARY 1, 2019 TO DECEMBER 31, 2019**



**This report is intended for internal use by management of Edfinancial Services, LLC  
and its customers.**

EDFINANCIAL SERVICES, LLC  
REPORT ON MANAGEMENT’S ASSERTIONS  
REGARDING COMPLIANCE WITH THE SPECIFIED COMPLIANCE  
REQUIREMENTS INCLUDED IN THE  
LENDER SERVICER FINANCIAL STATEMENT  
AUDIT AND COMPLIANCE ATTESTATION GUIDE  
ISSUED BY THE U.S. DEPARTMENT OF EDUCATION,  
OFFICE OF INSPECTOR GENERAL  
AND  
INDEPENDENT ACCOUNTANT’S REPORT  
FOR THE YEAR ENDED DECEMBER 31, 2019

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INDEPENDENT ACCOUNTANT'S REPORT

Board of Directors  
Edfinancial Services, LLC  
Knoxville, Tennessee

We have examined management of Edfinancial Services, LLC's assertion that Edfinancial Services, LLC ("Edfinancial") complied with the specified compliance requirements regarding LaRS Reporting; Loan Records; Interest Benefits; Special Allowance Payments; Loan Sales, Purchases, and Transfers; Enrollment Reports; Payment Processing; Due Diligence in Collection of Delinquent Loans; Timely Claim Filings; Curing Due Diligence and Timely Filing Violations; and Holding Loans as a Trustee for an Institution of Higher Education or an Affiliated Organization; listed in Section 3 of the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide*, for the year ended December 31, 2019. Management is responsible for its assertions about Edfinancial's compliance with the specified requirements. Our responsibility is to express an opinion on management's assertions about Edfinancial's compliance with the specific requirements based on our examination.

Our examination was conducted in accordance with the attestation standards established by the American Institute of Certified Public Accountants; standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the requirements contained in the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* issued by the U.S. Department of Education, Office of Inspector General. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertions about Edfinancial's compliance with the specific requirements is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertions are fairly stated, in all material respects. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertions, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination does not provide a legal determination on Edfinancial's compliance with the specified requirements.

In our opinion, management's assertions listed on pages 5 - 6 that Edfinancial complied with the specific requirements referred to above, is fairly stated, in all material respects, based on the requirements of the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide*.

In accordance with *Government Auditing Standards*, we are required to report significant deficiencies in internal control identifying those considered to be material weaknesses, violations of provisions of contracts or grant agreements, and abuse that could have a material effect on Edfinancial's compliance with the specified requirements regarding LaRS Reporting; Loan Records; Interest Benefits; Special Allowance Payments; Loan Sales, Purchases, and Transfers; Enrollment Reports; Payment Processing; Due Diligence in the Collection of Delinquent Loans; Timely Claim Filings; Curing Due Diligence and Timely Filing Violations; and Holding Loans as a Trustee for an Institution of Higher Education or an Affiliated Organization; listed in Section 3 of the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* and any fraud and noncompliance with provisions of laws or regulations that are more than inconsequential that come to our attention during our examination. We are also required to obtain the views of management on those matters. We performed our examination to express an opinion on whether management's assertions referred to above are fairly stated, in all material respects, and not for the purpose of expressing an opinion on internal control over the compliance requirements referred to above or on other compliance and other matters; accordingly, we express no such opinions. The results of our examination disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

This report is intended solely for the information and use of the U.S. Department of Education, the management of Edfinancial and the specified lenders and the independent auditors of such lenders and is not intended to be and must not be used by anyone other than these specified parties.

Kraft CPAs PLLC

Nashville, Tennessee  
February 12, 2020

EDFINANCIAL SERVICES, LLC

LENDER SERVICER AND AUDITOR INFORMATION SHEET

LENDER SERVICER INFORMATION:

LENDER SERVICER: Edfinancial Services, LLC  
LENDER OR SERVICER'S ADDRESS: 298 North Seven Oaks Drive, Knoxville, TN 37922  
ENTITY'S ID NUMBER: 700129  
  
TELEPHONE NUMBER: (800) 337-6884  
FAX NUMBER: (865) 694-6383  
  
CHIEF EXECUTIVE OFFICER: Wm. Anthony Hollin  
PRIMARY CONTACT: Brenda Cox, Chief Compliance Officer

AUDIT FIRM INFORMATION:

MEMBER IN CHARGE: Sean Owens  
E-MAIL ADDRESS: sowens@kraftcpas.com  
STATE IN WHICH LICENSED AND:  
CPA LICENSE NUMBER TN license # 19537  
FIRM'S NAME: KraftCPAs PLLC  
ADDRESS: 555 Great Circle Road, Nashville, TN 37228  
  
TELEPHONE NUMBER: (615) 242-7351  
FAX NUMBER: (615) 782-4271

EDFINANCIAL SERVICES, LLC

LENDER SERVICER AND AUDITOR INFORMATION SHEET (CONTINUED)

LENDER CLIENT INFORMATION:

The following is a listing of Edfinancial Services, LLC lender clients for the year ended December 31, 2019:

<u>LENDER NAMES</u>	<u>LENDER ID(S)</u>
LELA	805149, 805178
cPort Credit Union	805725
Katahdin Federal Credit Union	805727
Maine Family Federal Credit Union	805798
Seaboard Federal Credit Union	805800
Central Maine Credit Union	805809
HSBC	808047
First Tennessee	810563
First Farmers & Merchants	810617
First Horizon	810643
Nelnet	824573, 833669
Bath Savings	826294
IDAPP	826351, 824697
ASLA	826509
University Credit Union	827305
Community Credit Union	827597
CSLF	828614
Evergreen Credit Union	828855
Otis Federal Credit Union	829114
Maine Highlands	830544
Atlantic Regional	831775
Sanford Institute For Savings	832364
South Texas Costep	833264
FirstBank	833540
First Financial Bank	833646
Redstone Federal Credit Union	833805
National-Louis University	833956
North Texas	834097, 834544
National ED	834378
Edfinancial	834563



## Management's Assertions and Representations

To: KraftCPAs PLLC  
555 Great Circle Road  
Nashville, TN 37228

### ASSERTIONS

The management of Edfinancial Services, LLC ("Edfinancial") provides these assertions and representations to your firm because it is conducting an engagement of Edfinancial's compliance with the U.S. Department of Education's *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* (the "Guide"), for the year ended December 31, 2019. The purpose of the compliance engagement is to express an opinion about whether Edfinancial has complied with the requirements, described in the following subsection of Section 3 of the Guide:

#### **1. LENDER'S INTEREST AND SPECIAL ALLOWANCE REQUEST AND REPORT (LaRS)**

Edfinancial complied with the LaRS reporting compliance requirements on behalf of Edfinancial's clients, as described in Section 3.2.

#### **2. LOAN RECORDS**

Edfinancial complied with the Loan Record compliance requirements on behalf of Edfinancial's clients, as described in Section 3.3.

#### **3. INTEREST BENEFITS**

Edfinancial complied with the Interest Benefits compliance requirements on behalf of Edfinancial's clients, as described in Section 3.4.

#### **4. SPECIAL ALLOWANCE PAYMENTS / RETURN OF EXCESS INTEREST**

Edfinancial complied with the Special Allowance Payments/Return of Excess Interest compliance requirements on behalf of Edfinancial's clients, as described in Section 3.5.

#### **5. LOAN SALES, PURCHASES, AND TRANSFERS**

Edfinancial complied with the Loan Sales, Purchases, and Transfers compliance requirements on behalf of Edfinancial's clients, as described in Section 3.6.

**6. ENROLLMENT REPORTS**

Edfinancial complied with the Enrollment Report compliance requirements on behalf of Edfinancial's clients, as described in Section 3.7.

**7. PAYMENT PROCESSING**

Edfinancial complied with the Payment Processing compliance requirements on behalf of Edfinancial's clients, as described in Section 3.8.

**8. DUE DILIGENCE BY LENDERS IN THE COLLECTION OF DELINQUENT LOANS**

Edfinancial complied with the Due Diligence by Lenders in the Collection of Delinquent Loans compliance requirements on behalf of Edfinancial's clients, as described in Section 3.9.

**9. TIMELY CLAIM FILINGS**

Edfinancial complied with the Timely Claim Filings compliance requirements on behalf of Edfinancial's clients, as described in Section 3.10.

**10. CURING DUE DILIGENCE AND TIMELY FILING VIOLATIONS**

Edfinancial complied with the Curing Due Diligence and Timely Filing Violations compliance requirements on behalf of Edfinancial's clients, as described in Section 3.11.

**11. HOLDING LOANS AS A TRUSTEE FOR AN INSTITUTION OF HIGHER EDUCATION OR AN AFFILIATED ORGANIZATION**

Edfinancial, for the year ended December 31, 2019, did not hold loans as a trustee; therefore, Edfinancial's compliance with Holding Loans as a Trustee for an Institution of Higher Education or an Affiliated Organization's compliance requirements on behalf of Edfinancial's clients, as described in Section 3.12, was not applicable.

## REPRESENTATIONS

We also represent that the management of Edfinancial:

- Acknowledges and accepts responsibility for its compliance with the specified requirements;
- Acknowledges and accepts responsibility for establishing an effective internal control structure over compliance;
- Acknowledges and accepts responsibility for the design and implementation of program controls to provide reasonable assurance that fraud is prevented and detected;
- We have performed an evaluation of Edfinancial's compliance with the specified compliance requirements. Based on our evaluation, Edfinancial has complied with the specified compliance requirements for the year ended December 31, 2019;
- Asserts that, based on its evaluation of the requirements identified in Section 3 of the U.S. Department of Education's *Lender Servicer Financial Statement Audit and Compliance Attestation Guide*, Edfinancial is in compliance with those requirements and the internal controls relating to those requirements are effective;
- Is not aware of noncompliance with the specified compliance requirements for the year ended December 31, 2019 or through the date of this letter;
- Has made available to you, the auditor, all documentation related to compliance with the specified requirements;
- Has disclosed any communications, if any, from regulatory agencies, internal auditors, and other auditors concerning possible noncompliance with the specified requirements, including communications received for the year ended December 31, 2019 or through the date of the accountants' report;
- Has disclosed any known noncompliance occurring subsequent to year end for which, or date we are making these assertions, February 12, 2020; and
- Has not provided any interpretations to you, the auditor, of compliance requirements that have varying interpretations.

The management of Edfinancial confirms that the assertions and representations provided above are true and accurate, to the best of its knowledge and belief.

/s/ Wm. Anthony Hollin  
Chairman of the Board and CEO

/s/ John Farinella  
Executive Vice President and COO

/s/ Brenda Cox  
Chief Compliance Officer

EDFINANCIAL SERVICES, LLC

SCHEDULE OF FINDINGS AND QUESTIONED AMOUNTS BY COMPLIANCE  
REQUIREMENT FOR THE YEAR ENDED DECEMBER 31, 2019

No instances of noncompliance with the requirements specified in Section 3 of the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* were detected during the engagement for the year ended December 31, 2019.



EDFINANCIAL SERVICES, LLC

SUMMARY SCHEDULE ON THE RESOLUTION OF PRIOR ENGAGEMENT FINDINGS FOR  
THE YEAR ENDED DECEMBER 31, 2018

Finding 2018-6-1:

Condition: Noted two loan conversions, totaling \$6,868.79, in which Edfinancial did not produce the required communication to the borrower and communication appears to have not been sent.

Criteria: The lender must (1) comply with the notification requirements in 34 C.F.R. §682.208(e) and 34 C.F.R. §682.208(b)(2) upon assignment or transfer of ownership interest of a Stafford, PLUS, SLS, or Consolidation loan that results in a change in the identity of the party to whom the borrower must send subsequent payments and (2) pay all fees required by 34 C.F.R. §682.305(a)(4).

Universe and sample size: There were 35,604 loan conversions during the year ended December 31, 2018. Auditor selected a random sample of 60 loan conversions for testing.

Cause: The SLSS servicing system does not automatically generate notification letters for manual conversions; therefore, letters are manually requested. This was a human error.

Effect or Potential Effect: Due to human error, Edfinancial did not notify the borrower in question of the conversion of their loan to Edfinancial's servicing system.

Recommendation for Corrective Action: Since this is a manual process, Edfinancial should consider implementing a tracking process to ensure that required communications has been sent to borrowers related to the conversion of their loans to Edfinancial's servicing system.

Action Plan: Edfinancial has created a report that will identify loans that were loaded to the SLSS system and had a repurchase letter ordered. The report will be generated every Monday and will populate any loans that were loaded on the system for the prior week. If there was not a repurchase letter ordered, one will be ordered that day.

Status: The Action Plan was implemented on August 9, 2018.



**NELNET, INC.**

Compliance Audits (Attestation Engagements) for  
Lender Servicers that Service Federal Family Education  
Loan Program Loans

Year ended December 31, 2019

(With Independent Accountants' Report Thereon)

**NELNET, INC.**

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KPMG LLP  
Suite 300  
1212 N. 96th Street  
Omaha, NE 68114-2274

Suite 1120  
1248 O Street  
Lincoln, NE 68508-1493

## Independent Accountants' Report

The Board of Directors  
Nelnet, Inc.:

We have examined management of Nelnet, Inc.'s assertions, included in the accompanying Report on Management's Assertions on Compliance with Specified Federal Family Education Loan Program Requirements, that Nelnet, Inc. complied with the following compliance requirements specified in Section 3 of the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* issued by the U.S. Department of Education, Office of the Inspector General dated January 2011 (the Guide), relative to Nelnet, Inc.'s administration of the Federal Family Education Loan Program on behalf of its lender clients in Appendix B during the year ended December 31, 2019:

- LaRS Reporting;
- Loan Records;
- Interest Benefits;
- Special Allowance Payments;
- Loan Sales, Purchases, and Transfers;
- Enrollment Reports;
- Payment Processing;
- Due Diligence in Collection of Delinquent Loans;
- Timely Claim Filings;
- Curing Due Diligence and Timely Filing Violations; and

Nelnet, Inc.'s management is responsible for its assertions. Our responsibility is to express an opinion on management's assertions about Nelnet, Inc.'s compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants; the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States; and the requirements contained in the Guide. Those standards and the Guide require that we plan and perform the examination to obtain reasonable assurance about whether management's assertions about compliance with the specified requirements are fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about whether management's assertions are fairly stated, in all material respects. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertions, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination does not provide a legal determination on Nelnet, Inc.'s compliance with the specified requirements.



In our opinion, management's assertions that Nelnet, Inc. complied with the aforementioned compliance requirements listed in Section 3 of the Guide, relative to Nelnet, Inc.'s administration of the Federal Family Education Loan Program on behalf of its lender clients during the year ended December 31, 2019, are fairly stated, in all material respects.

The purpose of this report is to examine management of Nelnet, Inc.'s assertions that Nelnet, Inc. complied with the aforementioned compliance requirements listed in Section 3 of the Guide, relative to Nelnet, Inc.'s administration of the Federal Family Education Loan Program on behalf of its lender clients during the year ended December 31, 2019. Accordingly, this report is not suitable for any other purpose.

*KPMG LLP*

Lincoln, Nebraska  
February 17, 2020



February 17<sup>th</sup>, 2020

KPMG LLP  
1248 O St.  
Suite 1120  
Lincoln, NE 68508

The management of Nelnet, Inc. (Nelnet) provides these assertions to your firm because it is conducting an engagement of Nelnet's compliance with the U.S. Department of Education's *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* (Guide). The purpose of the compliance engagement is to express an opinion about whether Nelnet has complied with the requirements, described in the following subsections of Section 3 of the Guide:

§3.2	LaRS Reporting;
§3.3	Loan Records;
§3.4	Interest Benefits;
§3.5	Special Allowance Payments <sup>1</sup> ;
§3.6	Loan Sales, Purchases, and Transfers;
§3.7	Enrollment Reports;
§3.8	Payment Processing;
§3.9	Due Diligence in the Collection of Delinquent Loans;
§3.10	Timely Claim Filings; and
§3.11	Curing Due Diligence and Timely Claim Filing Violations

We also represent that the management of Nelnet:

- Acknowledges and accepts responsibility for its compliance with the specified requirements;
- Acknowledges and accepts responsibility for establishing an effective internal control structure over compliance;
- Has evaluated its compliance with the specified requirements or its controls for ensuring compliance and detecting noncompliance with requirements, as applicable;
- Asserts that, based on its evaluation of the requirements identified in Section 3 of the U.S. Department of Education's *Lender Servicer Financial Statement Audit and Compliance Attestation Guide*, that Nelnet is in compliance with those requirements and the internal controls relating to those requirements are effective;

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<sup>1</sup> Within Subsection 3.5 (Special Allowance Payments) of the guide, 3.5(c)(1)(e) requirements related to Accuracy of reporting 9.5 percent floor loans and 3.5(c)(1)(f) requirements related to Loan held as trustee on behalf of another entity are not applicable to Nelnet's servicing of its lender clients.





- Has disclosed to you, the auditor, all known noncompliance;
- Has made available to you, the auditor, all documentation related to compliance with the specified requirements;
- Has disclosed any communications from regulatory agencies, internal auditors, and other auditors concerning possible noncompliance with the specified requirements, including communications received between the end of the period addressed in the written assertion and the date of the auditor's report;
- Has disclosed any known noncompliance occurring subsequent to the period for which, or date we are making these assertions, February 17<sup>th</sup>, 2020; and
- Has not provided any interpretations to you, the auditor, of compliance requirements that have varying interpretations.

The management of Nelnet confirms that the assertions and representations provided in this document are true and accurate, to the best of its knowledge and belief.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Noordhoek', written over a horizontal line.

Jeff Noordhoek  
*Chief Executive Officer*

A handwritten signature in blue ink, appearing to read 'James D Kruger', written over a horizontal line.

Jim Kruger  
*Chief Financial Officer*



**NELNET, INC.**  
Schedule of Findings and Questioned Amounts  
Year ended December 31, 2019

None noted



**NELNET, INC.**

Practitioner's Comments on Prior Year's Examination  
Resolution Matters Relating to the FFEL Program  
Year ended December 31, 2019

None noted

**NELNET, INC.**

Background

December 31, 2019

Lenders participating in the Federal Family Education Loan (FFEL) Program frequently engage servicer organizations (servicers) to perform certain functions relating to the administration of that program. Third-party servicers that enter into contracts to administer any aspect of a participating lender's FFEL Program, as provided under Title 34 of the Code of Federal Regulation (C.F.R.) Part 682, are required to submit annual audited financial statements in accordance with 34 C.F.R §668.23(d)(5). Additionally, Section 428(b)(1)(U) of the Higher Education Act of 1965, as amended, and 34 C.F.R. §682.416(e) require all servicers to have an annual compliance audit performed by a nonfederal auditor. All financial statement audits and compliance attestation engagements conducted to satisfy the statutory and regulatory requirements cited above, except for audits of lenders or servicers that are nonprofit or governmental organizations, must be done in accordance with the *Lender Servicer Financial Statement Audit and Compliance Attestation Guide* (the Guide) dated January 31, 2011.

As it relates to the lender compliance attestation engagement, lenders using a third-party service organization(s) to service all or part of its FFEL Program loan portfolio may not be able to make all of the assertions required in Section III of the *Lender Compliance Attestation Engagement Guide* (the Lender Guide) dated January 31, 2011. In those situations, the Department of Education will accept, as meeting the lender compliance attestation engagement requirement, an independent accountants' report based upon an "alternative or combined" engagement as defined in Section IV of the Lender Guide. The lender must obtain from the service organization an audit/attestation report that meets the requirements described in Section IV of the Lender Guide.

The independent accountants' report(s) must include their opinion with respect to the service organization's compliance with the specified requirements in Section 3 of the Guide pertaining to functions carried out by the servicing organization.

Nelnet, Inc. (Nelnet) is a for-profit third-party student loan servicing organization responsible for the proper and timely performance of many aspects of student loan processing. Nelnet operates servicing centers in Aurora, Colorado, and Lincoln, Nebraska. The primary services provided to the loan holders by Nelnet are:

- Accepting loan origination and disbursement information on new and existing borrowers
- Processing of general borrower correspondence, forbearance, and deferment requests and borrower status changes
- Receiving and tracking original, imaged, or electronic loan documentation
- Maintaining borrower demographic information while the student is in school, billing accrued interest to the appropriate parties, and combining multiple loans where appropriate
- Processing borrower loans through the grace period, placing the loans into repayment, and calculating monthly payment amounts
- Applying loan payments, calculating delinquency periods, collection activities, claim processing on defaulted loans, and cure procedures for defaulted loans rejected by the guarantor

The functions described above provide a basis for Nelnet to prepare information for the quarterly Lender's Interest and Special Allowance Request and Reports – LaRS.

The lender IDs covered by this report are included in Appendix B.

Appendix B

NELNET, INC.

Listing of Lender IDs Covered by Compliance Attestation

December 31, 2019

800061	819129	826191	830332	832292	833078	833596	833924
802198	819173	826509	830336	832336	833084	833637	833934
805178	819256	826584	830351	832344	833120	833640	833955
806232	819515	826910	830370	832346	833128	833659	833963
808170	819591	827104	830492	832347	833146	833668	834006
808543	819657	827656	830704	832379	833155	833669	834017
808851	819873	828416	830720	832407	833174	833670	834045
810436	819958	828545	830772	832432	833193	833714	834071
810815	820174	828577	830922	832438	833220	833733	834076
811025	820682	828580	830977	832463	833253	833751	834088
811703	820685	828715	831056	832486	833262	833752	834097
811704	820694	828812	831221	832494	833307	833760	834119
811911	821017	829212	831794	832630	833358	833764	834202
811946	822051	829293	831476	832637	833393	833770	834223
817125	822218	829324	831807	832642	833405	833804	834336
817146	822440	829346	832086	832687	833411	833806	834378
817574	822490	829414	832095	832735	833456	833816	834409
817760	822605	829512	832108	832848	833457	833821	834416
814657	823247	829565	832116	832868	833500	833855	834453
815675	823459	829833	832124	832892	833501	833862	834465
815901	824038	829928	832179	832897	833528	833868	834469
816773	824573	830091	832218	832919	833529	833893	834477
817517	824945	830160	832275	833016	833534	833895	834543
818505	825240	830241	832286	833017	833555	833907	834544
818611	825585	830267	832290	833049	833570	833923	834550
							933078

**James W. Parks II**  
President and CEO

**Tricia A. Dubroc**  
VP of Student Loans and Administration

**Martin Walke**  
VP of Economic Development



**LPFA**  
LOUISIANA PUBLIC FACILITIES AUTHORITY

BOARD OF TRUSTEES

**Guy Campbell III**, Chairman  
**Ronald H. Bordelon**, Vice Chairman  
**Craig A. Cheramie**, Secretary-Treasurer  
**Michael C. Darnell**  
**Larry Ferdinand**  
**David W. Groner**  
**Casey R. Guidry**

June 24, 2020

Postlethwaite & Netterville, APAC  
8550 United Plaza Boulevard, Suite 1001  
Baton Rouge, LA 70809


Ladies and Gentlemen:

In connection with your engagement to apply agreed-upon procedures to our assertions about Louisiana Public Facilities Authority's compliance with certain U.S. Department of Education requirements relating to Louisiana Public Facilities Authority's 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's participation in the Federal Family Education Loan Program (FFEL) during the year ended December 31, 2019, we confirm, to the best of our knowledge and belief, the following representations made to you during your engagement:


1. We are responsible for complying with the U.S. Department of Education's reporting requirements relating to participation in the FFEL program.
2. We are responsible for establishing and maintaining effective internal control over compliance with the specified compliance requirements.
3. We acknowledge responsibility for
  - i. The subject matter and the assertions below:
    - a. Providing all lender service contracts
    - b. Providing all lender servicer engagement reports
    - c. There are no other compliance requirements, other than those noted above, with the Federal Family Education Loan Program that require consideration
  - ii. Selecting the criteria, when applicable; and
  - iii. Determining that such criteria are appropriate for the responsible party's purposes.
4. We have performed an evaluation of the Louisiana Public Facilities Authority 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's compliance with the specified compliance requirements.
5. The following assertions are correct:

- a) The information included in the LaRS submitted to ED during the year ended December 31, 2019 were prepared by Nelnet Loan Services and Educational Services of America, Inc. d/b/a Edfinancial Services (the lender servicers).
  - b) The lender Servicers' engagement reports meet the requirements in Section IV of the Audit Guide, *Lender Compliance Attestation Engagement Guide for Lenders Holding Federal Family Education Loan Program Loans*, for the alternative method engagement.
  - c) All instances of noncompliance reported in the lender servicer engagement reports that relate to a FFEL program compliance requirement function for which the lender has contracted the lender servicer to perform have been disclosed in the lender's engagement report.
6. The lender IDs covered by the preceding assertions are 805178 and 805149.
  7. We have disclosed all communications from regulatory agencies, internal auditors, guaranty agencies, or other independent accountants or consultants, regarding compliance with the specified requirements and the resolution of any reported findings in any report within the immediate two years prior to the engagement period (if any). We have also disclosed to you any communications received between December 31, 2019 and June 24, 2020.
  8. We have made available to you all documentation and other information relating to compliance with the specified requirements.
  9. We have made available all agreements, documents, and electronic files pertinent to the scope of the engagement.
  10. For the preceding five years, Louisiana Public Facilities Authority has not been limited, suspended, or terminated by ED nor has Louisiana Public Facilities Authority been cited for failure to submit required audits/attestation engagements.
  11. We have responded fully to all inquires made to us by you during the engagement.
  12. We have not provided any interpretations to you, the auditor, of compliance requirements that have varying interpretations.
  13. The LaRS reports we provided to you are copies of the forms submitted to the U.S. Department of Education. These forms were prepared by Nelnet Loan Services and Educational Services of America, Inc. d/b/a Edfinancial Services.
  14. Your report is intended solely for the information and use of the board of trustees, management and the U.S. Department of Education and is not intended to be and should not be used by anyone other than these specified parties.

Signature:  
Title:  
Date:

  
President and CEO  
6-25-20

Signature:  
Title:  
Date:

  
Accountant  
6-25-2020

Signature:

Laura A. Duke

Title:

Vice President of Student Loans

Date:

6-25-20