OFFICE OF TREASURER OF STATE IOWA ABLE SAVINGS PLAN TRUST

INDEPENDENT AUDITOR'S REPORTS BASIC FINANCIAL STATEMENTS AND SUPPLEMENTARY INFORMATION

JUNE 30, 2022



OFFICE OF AUDITOR OF STATE

STATE OF IOWA

State Capitol Building Des Moines, Iowa 50319-0006 Rob Sand Auditor of State

Telephone (515) 281-5834 Facsimile (515) 281-6518

October 7, 2022

Office of Treasurer of State, Iowa ABLE Savings Plan Trust Des Moines, Iowa

To the Members of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust:

I am pleased to submit to you the financial and compliance audit report for the Office of Treasurer of State, Iowa ABLE Savings Plan Trust for the year ended June 30, 2022. The audit was performed pursuant to Chapter 12I.7 of the Code of Iowa and in accordance with U.S. auditing standards applicable to financial audits contained in <u>Government Auditing Standards</u>.

I appreciate the cooperation and courtesy extended by the officials and employees of Office of Treasurer of State, Iowa ABLE Savings Plan Trust throughout the audit. If I or this office can be of any further assistance, please contact me or my staff at 515-281-5834.

Sincerely,

Rob Sand Auditor of State

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Officials

<u>Name</u>

<u>Title</u>

State

Governor Director, Department of Management Director, Legislative Services Agency

Agency

Honorable Michael L. Fitzgerald Karen Austin

Honorable Kim Reynolds

Kraig Paulsen

Tim McDermott

Treasurer of State Chief of Staff



OFFICE OF AUDITOR OF STATE

STATE OF IOWA

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To the Honorable Michael L. Fitzgerald, Treasurer of State:

Report on the Audit of the Financial Statements

Opinions

We have audited the accompanying financial statements of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust (Trust), as of and for the year ended June 30, 2022, and the related Notes to Financial Statements, which collectively comprise the Trust's basic financial statements listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the fiduciary net position of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust as of June 30, 2022 and the respective changes in fiduciary net position for the year then ended in accordance with U.S. generally accepted accounting principles.

Basis for Opinions

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 <u>Government Auditing</u> <u>Standards</u> issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of Financial Statements section of our report. We are required to be independent of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust, and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Emphasis of Matter

As discussed in Note 1, the financial statements of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust are intended to present the financial position and results of operations of only that portion of the financial reporting entity of the State of Iowa attributable to the transactions of the Iowa ABLE Savings Plan Trust. They do not purport to, and do not, present fairly the financial position of the State of Iowa as of June 30, 2022, and the changes in its financial position for the year then ended in conformity with U.S. generally accepted accounting principles.

Responsibilities of Management for the Financial Statements

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

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Office of Treasurer of State, Iowa ABLE Savings Plan Trust's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

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

In performing an audit in accordance with generally accepted auditing standards and <u>Government</u> <u>Auditing Standards</u>, we:

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

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

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the Management's Discussion and Analysis on pages 8 and 9 be presented to supplement the basic financial statements. Such information is the responsibility of management and, 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 Office of Treasurer of State, Iowa ABLE Savings Plan Trust's basic financial statements. The supplementary information included in Schedules 1 through 3 is presented for purposes of additional analysis and is not a required part of the basic financial statements.

Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The 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, the supplementary information in Schedules 1 through 3 is fairly stated, in all material respects, in relation to the basic financial statements taken as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with <u>Government Auditing Standards</u>, we have also issued our report dated October 7, 2022 on our consideration of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is 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 Trust's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with <u>Government Auditing Standards</u> in considering the Office of Treasurer of State, ABLE Savings Plan Trust's internal control over financial reporting and compliance.

Ernest H. Ruben, Jr., CPA Deputy Auditor of State

October 7, 2022

MANAGEMENT'S DISCUSSION AND ANALYSIS

The Office of Treasurer of State, Iowa ABLE Savings Plan Trust (Trust) provides this Management's Discussion and Analysis of the Trust's annual financial statements. This narrative overview and analysis of the financial activities of the Trust is for the fiscal year ended June 30, 2022. We encourage readers to consider this information in conjunction with the Trust's financial statements, which follow this section.

<u>Iowa ABLE Trust Plan</u>

The Iowa ABLE Savings Plan Trust was created in 2015 to assist individuals with tax-advantaged savings for qualifying disability-related expenses without jeopardizing federal means-tested benefits. In order to create a program with the scale to attract high quality service providers and offer economical services, Iowa joined with six other states. In January of 2016, the states entered into the ABLE Interstate Agreement ("Interstate Agreement"). Each participating state is referred to as a "Member State" of the National ABLE Alliance (the "Alliance"). An amendment to the Interstate Agreement is executed when a new state joins the Alliance. As of June 30, 2022, the Alliance consisted of the following eighteen states: Alaska, Arkansas, Colorado, Connecticut, Delaware, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Mississippi, Montana, Nevada, New Jersey, North Carolina, Pennsylvania, Rhode Island, and the District of Columbia.

The Interstate Agreement directed the State of Illinois to procure a vendor to provide investment and recordkeeping services for the Alliance. The Member States worked together to craft an RFP which was issued by the State of Illinois in the spring of 2016. All Member States, at the time of the RFP, evaluated and scored the proposals and selected Ascensus College Savings Recordkeeping Services LLC ("Ascensus") as the Program Manager in the fall of 2016. The State of Illinois negotiated a Master Agreement with Ascensus, which had input from, and was approved by, the Alliance. Each Member State then negotiated an individual Implementing Agreement with Ascensus under the Master Agreement. In 2021, as the Agreement with Ascensus was approaching the end of the initial term, the Alliance underwent an RFP process for a Program Manager. On June 29, 2022, the Alliance signed a new Agreement with Ascensus, who remains the Program Manager.

At the direction of the Member States, Ascensus established the ABLE Consortium Trust ("Consortium Trust") to provide for the investment and reinvestment of the assets of the ABLE plans established by Member States ("Member Plans"). Ascensus Investment Advisors, LLC, (the "Administrator") serves as the administrator of the Consortium Trust.

The assets of each Member Plan are held in a separate series of the Consortium Trust (each a "Series") on behalf of the Member Plan. The assets of each Series belong solely to the Member Plan that contributed the assets to the Consortium Trust and are separately accounted for by the Administrator. No Series has any claim on the assets held in another Member Plan's Series. The Consortium Trust and the Series are designed to permit the collective investment of the assets of the account owners through the Member Plans. The assets of a Member Plan in its Series are invested in the investment options as directed by the Member Plan. The Program Manager accounts for the assets of each Member Plan, and each account owner, separately.

USING THESE FINANCIAL STATEMENTS

This discussion and analysis is intended to serve as an introduction to the Trust's financial statements, which consist of the Statement of Fiduciary Net Position and the Statement of Changes in Fiduciary Net Position (pages 12 and 13). They also include the Notes to Financial Statements which begin on page 14. These financial statements provide information about the activities of the Trust as a whole and are based on the flow of economic resources measurement focus and the accrual basis of accounting. The flow of economic resources refers to all of the assets available to the Trust for the purpose of fulfilling its responsibilities to the other parties in the fiduciary relationship.

The financial statements are further described as follows:

The Statement of Fiduciary Net Position presents the assets, liabilities and net position of the Trust.

The Statement of Changes in Fiduciary Net Position summarizes the additions to, deductions from and the net increase or decrease in fiduciary net position for the year.

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

FINANCIAL ANALYSIS OF THE TRUST

During fiscal year 2022, the Trust received a \$200,000 allocation from a General Fund appropriation to the Iowa Department of Human Services to be used for administration activities of the Trust.

At June 30, 2022, there were 1,627 account owners, a 481, or 42%, increase in account holders over the prior year.

The Trust's financial activity for the year ended June 30, 2022 resulted in an increase in the ending fiduciary net position of \$3,370,574.

Condensed financial information as of and for the year ended June 30, 2022 is as follows:

	 June 30,		
	 2022	2021	
Cash and investments Liabilities	\$ 15,034,453 20,107	11,659,562 15,790	
Net position held in trust for others	\$ 15,014,346	11,643,772	
	 Year ended	June 30,	
	2022	2021	
Additions:			
Allocation from Iowa Department of Human Services	\$ 200,000	200,000	
Contributions	6,108,253	5,229,723	
Net investment income (loss) and other	 (1,095,686)	1,018,344	
Total additions	5,212,567	6,448,067	
Deductions:			
Distributions to account owners	1,737,881	1,103,134	
Administrative expenses	 104,112	90,670	
Net increase in fiduciary net position	3,370,574	5,254,263	
Net position beginning of year	 11,643,772	6,389,509	
Net position end of year	\$ 15,014,346	11,643,772	

CONTACTING THE OFFICE OF TREASURER OF STATE, IOWA ABLE SAVINGS TRUST PLAN

This financial report is designed to present users with a general overview of the Trust's finances and to demonstrate the Trust's accountability for the funds held in custody. If you have questions about the report or need additional financial information, please contact the Office of Treasurer of State, State Capitol Building, Des Moines, Iowa 50319.

Basic Financial Statements

Statement of Fiduciary Net Position

June 30, 2022

Assets	1

Cash	\$ 7,503,984
Investments	 7,530,469
Total assets	15,034,453
Liabilities	
Accounts payable	 20,107
Net position	
Held in trust for others	\$ 15,014,346

See notes to financial statements.

Statement of Changes in Fiduciary Net Position

Year ended June 30, 2022

Additions:		
Allocation from Iowa Department of Human Services		\$ 200,000
Contributions from participants		6,108,253
Net investment loss		(1,101,626)
Administrative fees		 5,940
Total additions		 5,212,567
Deductions:		
Distributions to account owners		1,737,881
Administrative expenses:		
Salaries	\$ 58,791	
Supplies	2,361	
Contractual services for outside consultants		
and independent contractors	38,164	
Advertising	3,538	
Training	 1,258	 104,112
Total deductions		 1,841,993
Net increase in fiduciary net position		3,370,574
Net position beginning of year		 11,643,772
Net position end of year		\$ 15,014,346

See notes to financial statements.

Notes to Financial Statements

June 30, 2022

(1) Summary of Significant Accounting Policies

The Iowa ABLE Savings Plan Trust (Trust) is a part of the Office of Treasurer of State of Iowa. The Trust was created by the General Assembly under Chapter 12I of the Code of Iowa, with the Treasurer of State as the trustee. According to Chapter 12I of the Code of Iowa, the General Assembly finds the general welfare and well-being of the state are directly related to the health, maintenance, independence and quality of life of its disabled residents, and a vital and valid public purpose is served by the creation and implementation of programs which encourage and make possible savings to secure funding for disability-related expenses on behalf of individuals with disabilities that will supplement, but not supplant, other benefits provided by various federal, state, and private sources. The purpose of the Trust is to allow citizens of the state to invest money for future payment of disability-related costs of an individual.

The 529A plan is administered under the Trust. The Iowa ABLE Savings 529A Plan was established in fiscal year 2015 to be sold directly to the public.

The financial statements of the Trust have been prepared in conformity with U.S. generally accepted accounting principles as prescribed by the Governmental Accounting Standards Board.

A. <u>Reporting Entity</u>

For financial reporting purposes, the Trust has included all funds, organizations, agencies, boards, commissions and authorities. The Trust has also considered all potential component units for which it is financially accountable and other organizations for which the nature and significance of their relationship with the Trust are such that exclusion would cause the Trust's financial statements to be misleading or incomplete. The Governmental Accounting Standards Board has set forth criteria to be considered in determining financial accountability. These criteria include appointing a voting majority of an organization's governing body and (1) the ability of the Trust to impose its will on that organization or (2) the potential for the organization to provide specific benefits to or impose specific financial burdens on the Trust. The Trust has no component units which meet the Governmental Accounting Standards Board criteria.

B. <u>Measurement Focus</u>, Basis of Accounting and Financial Statement Presentation

The Trust is accounted for using the economic resources measurement focus and the accrual basis of accounting. Additions are recorded when earned and deductions are recorded when a liability is incurred, regardless of the timing of related cash flows.

The Trust is a fiduciary fund type and is classified as a private purpose trust for financial statement purposes. A private purpose trust is used to report a trust arrangement under which principal and income benefit individuals, private organizations or other governments. The Trust is used to account for resources which may be expended only for qualified disability expenses of an individual.

(2) Deposits and Investments

Cash as of June 30, 2022 included the cash balance of \$1,049,042 held in a demand deposit account, \$4,737,565 held in the checking option portfolio at Fifth Third Bank and \$1,717,377 in high yield savings within the Moderately Conservative Growth and Conservative Growth portfolios.

Except for the Checking Option, the Trust's investments are not bank deposits and are not insured by the federal depository insurance or any other government agency. Investments are stated at fair value. Due to the nature of investments in mutual funds, there is no assurance the accounts under the Trust will generate any specific rate of return and there is no assurance the accounts will not decrease in value. Mutual funds are not subject to risk categorization.

The portfolios' investments valuation is based on the fair value hierarchy established by the generally accepted accounting principles, based on the valuation inputs used, to measure the fair value of the asset. Level 1 inputs are quoted prices in active markets for identical assets; Level 2 inputs are significant other observable inputs; Level 3 inputs are significant unobservable inputs. As of June 30, 2022, the portfolio's investments were classified as Level 1.

Iowa Able Investment Plan

The Office of Treasurer of State has an agreement with Ascensus to invest funds for the Trust into specified portfolios which include mutual funds and deposit accounts. The Trust's investments at June 30, 2022 are all invested in mutual funds for the Iowa ABLE Trust Plan.

At June 30, 2022 the Iowa ABLE Trust Plan had investments in the following portfolios:

	Fair Value		
Portfolio	at	June 30, 2022	
Aggressive Growth	\$	1,381,930	
Moderately Aggressive Growth		1,320,900	
Growth		1,735,636	
Moderate Growth		1,391,465	
Moderately Conservative Growth		1,234,338	
Conservative Growth		2,183,577	
Checking Option		4,737,565	
Total	\$	13,985,411	

Credit Risk – Credit risk is the risk an issuer or other counterparty to an investment will not fulfill its obligation to the holder of the investment.

The various investment portfolios hold mutual funds, most of which contain investments not subject to credit risk. Certain portfolios hold mutual funds which contain investments subject to credit risk disclosure. However, the various investment portfolios are unrated.

Concentration of Credit Risk – The various portfolios hold mutual funds and, accordingly, disclosure of concentration of credit risk is not applicable.

Interest Rate Risk – Interest rate risk is the risk changes in interest rates will adversely affect the fair value of an investment. This risk is managed within the applicable portfolios using the effective duration methodology, which is widely used in the management of fixed income portfolios because it quantifies to a much greater degree the risk of interest rate changes. The methodology takes into account optionality on bonds and scales the risk of price changes on bonds depending upon the degree of change in rates and the slope of the yield curve.

Certain investment portfolios of the Iowa ABLE Trust Plan contain underlying fixed income investments subject to interest rate risk disclosure. The exposure is summarized using the effective duration methodology, as follows:

	Underlying Fixed Income Funds					
				Vanguard	iShares	Fair Value of
	Va	nguard	Vanguard	Short-Term	Core	Fixed Income
Iowa ABLE Investment Plan	Tot	al Bond	Short-Term	Inflation-Protected	International	Funds at
Investment Portfolio	Mar	ket Index	Bond Index	Securities Index	Aggregate Bond ETF	June 30, 2022
Aggressive Growth	\$	41,458	34,548	48,368	13,819	138,193
Moderately Aggressive Growth		99,068	82,556	115,579	33,023	330,225
Growth		208,276	173,564	242,989	69,425	694,254
Moderate Growth		229,592	191,326	267,857	76,531	765,306
Moderately Conservative Growth		166,636	138,863	194,408	55,545	555,452
Conservative Growth		196,522	163,768	229,276	65,507	655,073
	\$	941,551	784,626	1,098,476	313,850	3,138,503
Effective Duration (Years) as of September 30, 2022:		<u>6.67</u>	2.67	2.58	7.12	

(3) Account Owner Contributions

Any United States citizen with a valid social security number, who was diagnosed with a qualifying disability prior to age 26 and who has a desire to save for qualified disability expenses can open an account. Account owners can save through the Trust without losing eligibility for certain assistance programs such as Social Security and Medicaid. The minimum amount of any one contribution is \$25 with an annual contribution limit of \$16,000. Contributions are not required to be made each year. Additionally, eligible individuals with disabilities may put money into their ABLE accounts, qualify for the Saver's Credit in many cases and roll money from their 529 plans, also known as qualified tuition plans, into their ABLE accounts. Also, if the ABLE beneficiary works, the beneficiary can also contribute part or all of what they earn to their ABLE account. This additional contribution is equal to the federal poverty level for a one-person household or the account owner's gross wages, whichever is less. However, the designated beneficiary is not eligible if their employer contributes to a workplace retirement plan on their behalf.

Contributions made by Iowa taxpayers up to \$3,522 per account in 2022 are deductible for State of Iowa income tax purposes. Earnings are tax exempt for state income tax purposes. A similar federal tax deduction does not exist for the contributions. Earnings are exempt for federal income tax purposes if funds are spent for qualified disability expenses. Earnings on non-qualified withdrawals are subject to federal income tax and a 10% federal penalty, as well as applicable state and local income tax.

(4) Administrative Account

Chapter 12I.2(13) of the Code of Iowa allows the Treasurer of State, as trustee, to establish, impose and collect administrative fees and charges in connection with transactions of the Trust. The assets of the Trust shall at all times be preserved, invested and expended solely and only for the purposes of the Trust and shall be held in trust for the account owners. The assets of the Trust shall not be transferred or used by the state for any purposes other than the purposes of the Trust. **Supplementary Information**

Combining Schedule of Fiduciary Net Position

June 30, 2022

	IABLE Investment		Administrative	
	Account		Account	Total
Assets				
Cash	\$	6,454,942	1,049,042	7,503,984
Investments		7,530,469	_	7,530,469
Total assets		13,985,411	1,049,042	15,034,453
Liabilities				
Accounts payable		-	20,107	20,107
Net position				
Held in trust for others	\$	13,985,411	1,028,935	15,014,346

See accompanying independent auditor's report.

Combining Schedule of Changes in Fiduciary Net Position

Year ended June 30, 2022

Additions:	IAB	LE Investment Account	Administrative Account	Total
Allocation from Iowa Department of Human Services	\$	-	200,000	200,000
Contributions from participants	Ŷ	6,108,253		6,108,253
Net investment loss		(1,101,626)	-	(1,101,626)
Administrative fees		-	5,940	5,940
Total additions		5,006,627	205,940	5,212,567
Deductions:				
Distributions to account owners		1,737,881	-	1,737,881
Administrative expenses:				
Salaries		-	58,791	58,791
Supplies		-	2,361	2,361
Contractual services for outside consultants				
and independent contractors		-	38,164	38,164
Advertising		-	3,538	3,538
Travel		-	1,258	1,258
Total administrative expenses		-	104,112	104,112
Total deductions		1,737,881	104,112	1,841,993
Net increase in fiduciary net position		3,268,746	101,828	3,370,574
Net position beginning of the year		10,716,665	927,107	11,643,772
Net position end of year	\$	13,985,411	1,028,935	15,014,346

See accompanying independent auditor's report.

Summary of Expenses for Outside Consultants and Independent Contractors

Year ended June 30, 2022

Type of Service	Amount
Legal consulting services	\$ 34,957
Banking charges	204
Software	424
Website development	 2,578
Total	\$ 38,164

See accompanying independent auditor's report.



OFFICE OF AUDITOR OF STATE

STATE OF IOWA

Rob Sand Auditor of State

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Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards

To the Honorable Michael L. Fitzgerald, Treasurer of State:

We have audited in accordance with U.S. generally accepted auditing standards and the standards applicable to financial audits contained in <u>Government Auditing Standards</u>, issued by the Comptroller General of the United States, the financial statements of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust, as of and for the year ended June 30, 2022, and the related Notes to Financial Statements, which collectively comprise the Trust's basic financial statements, and have issued our report thereon dated October 7, 2022.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Office of Treasurer of State, Iowa ABLE Savings Plan Trust's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust's internal control. Accordingly, we do not express an opinion on the effectiveness of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Trust's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control 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 or significant deficiencies may exist that were not identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Office of Treasurer of State, Iowa ABLE Savings Plan Trust's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the 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 which are required to be reported under <u>Government Auditing Standards</u>.

Purpose of this Report

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

We would like to acknowledge the many courtesies and assistance extended to us by personnel of the Office of Treasurer of State, Iowa ABLE Savings Plan Trust during the course of our audit. Should you have any questions concerning any of the above matters, we shall be pleased to discuss them with you at your convenience.

Ernest H. Ruben, Jr., CPA Deputy Auditor of State

October 7, 2022

Staff

This audit was performed by:

Ernest H. Ruben, Jr., CPA, Deputy Ryan J. Pithan, CPA, Manager Tristan J. Swiggum, Staff Auditor Miranda L. Hoch-deGuzman, Assistant Auditor