

**OFFICE OF TREASURER OF STATE  
IOWA EDUCATIONAL SAVINGS PLAN TRUST**

**INDEPENDENT AUDITOR'S REPORTS  
BASIC FINANCIAL STATEMENTS AND  
SUPPLEMENTARY INFORMATION**

**JUNE 30, 2025**

**Office of Treasurer of State  
Iowa Educational Savings Plan Trust**



**OFFICE OF AUDITOR OF STATE**  
**STATE OF IOWA**

State Capitol Building  
Des Moines, Iowa 50319-0006  
Telephone (515) 281-5834

Rob Sand  
Auditor of State

October 7, 2025

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

To the Honorable Roby Smith, Treasurer of State:

I am pleased to submit to you the financial and compliance audit report for the Office of Treasurer of State, Iowa Educational Savings Plan Trust for the year ended June 30, 2025. The audit was performed pursuant to Chapter 12D.8 of the Code of Iowa and in accordance with U.S. auditing standards applicable to financial audits contained in Government Auditing Standards.

I appreciate the cooperation and courtesy extended by the officials and employees of Office of Treasurer of State 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,

A handwritten signature in black ink, appearing to read "Rob Sand". The signature is stylized and written in a cursive-like font.

Rob Sand  
Auditor of State

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**Office of Treasurer of State  
Iowa Educational Savings Plan Trust**

**Officials**

Name

Title

**State**

Honorable Kim Reynolds  
Kraig Paulsen  
Timothy McDermott

Governor  
Director, Department of Management  
Director, Legislative Services Agency

**Agency**

Honorable Roby Smith  
Alicia Callanan

Treasurer of State  
Deputy Treasurer

**Office of Treasurer of State  
Iowa Educational Savings Plan Trust**



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**STATE OF IOWA**

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Auditor of State

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Independent Auditor's Report

To the Honorable Roby Smith, Treasurer of State:

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of the Office of Treasurer of State, Iowa Educational Savings Plan Trust (Trust) as of and for the year ended June 30, 2025, and the related Notes to Financial Statements, which collectively comprise the Trust's basic financial statements as listed in the table of contents.

In our opinion, the accompanying financial statements referred to above present fairly, in all material respects, the fiduciary net position of the Office of Treasurer of State, Iowa Educational Savings Plan Trust as of June 30, 2025, and the respective changes in its fiduciary net position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Office of Treasurer of State, Iowa Educational Savings Plan Trust, and to meet our 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 opinion.

Emphasis of a Matter

As discussed in Note 1, the financial statements of the Office of Treasurer of State, Iowa Educational Savings Plan Trust are intended to present the financial position and results of operations of only the portion of the financial reporting entity of the State of Iowa attributable to the transactions of the Iowa Educational 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, 2025 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.

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

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

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Office of Treasurer of State, Iowa Educational 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 judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Office of Treasurer of State, Iowa Educational 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 GAAS, 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 Educational Savings Plan Trust’s basic financial statements. The supplementary information included in Schedules 1 through 4 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 GAAS. In our opinion, the supplementary information in Schedules 1 through 4 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 Government Auditing Standards, we have also issued our report dated October 7, 2025 on our consideration of the Office of Treasurer of State, Iowa Educational 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 Government Auditing Standards in considering the Office of Treasurer of State, Iowa Educational Savings Plan Trust’s internal control over financial reporting and compliance.



Brian R. Brustkern, CPA  
Deputy Auditor of State

October 7, 2025

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## **MANAGEMENT’S DISCUSSION AND ANALYSIS**

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The Office of Treasurer of State, Iowa Educational 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, 2025. We encourage readers to consider this information in conjunction with the Trust’s financial statements, which follow this section.

### **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 2025, the Trust received \$518,120,320 in contributions from participants and distributed \$736,278,259 to participants and beneficiaries.

At June 30, 2025, the total number of participants, beneficiaries and accounts by plan were as follows:

	<u>Participants</u>	<u>Beneficiaries</u>	<u>Accounts</u>
ISave 529 Plan	129,768	235,328	279,646
Iowa Advisor 529 Plan	28,442	38,925	68,140
Total	<u>158,210</u>	<u>274,253</u>	<u>347,786</u>

The Trust’s financial activity for the year ended June 30, 2025 resulted in an increase in fiduciary net position of \$551,667,575, primarily due to a net increase in the fair value of investments of \$770,503,260.

Condensed financial information as of and for the years ended June 30, 2025 and 2024 is as follows:

	June 30, 2025	June 30, 2024
Assets		
Cash and investments	\$ 7,383,424,345	6,831,661,311
Liabilities	173,641	78,182
Net position restricted for the payment of higher education costs for designated beneficiaries	<u>\$ 7,383,250,704</u>	<u>6,831,583,129</u>
	Year Ended	Year Ended
	June 30, 2025	June 30, 2024
Additions:		
Contributions	\$ 518,120,320	473,259,103
Net increase in fair value of investments	770,503,260	746,891,916
Other	2,111,812	1,949,502
Total additions	<u>1,290,735,392</u>	<u>1,222,100,521</u>
Deductions:		
Distributions	736,278,259	702,494,890
Administrative expenses	2,789,558	1,560,159
Total deductions	<u>739,067,817</u>	<u>704,055,049</u>
Net increase in net position	551,667,575	518,045,472
Net position beginning of year	<u>6,831,583,129</u>	<u>6,313,537,657</u>
Net position end of year	<u>\$ 7,383,250,704</u>	<u>6,831,583,129</u>

Total additions increased primarily due to the investments registering a net increase in fair value of investments of \$770,503,260 during fiscal year 2025 compared to a net increase in fair value of investments of \$746,891,916 in fiscal year 2024. Total deductions increased primarily due to beneficiaries withdrawing additional funds for educational expenses (see Schedule 4) during fiscal year 2025. The increase in fair value of investments was due to changing market conditions. The increase in distributions of \$33,783,369 over the prior year is due to beneficiaries withdrawing additional funds for educational expenses (see Schedule 4).

**CONTACTING THE OFFICE OF TREASURER OF STATE, IOWA EDUCATIONAL SAVINGS PLAN TRUST**

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, IA 50319.

**Office of Treasurer of State  
Iowa Educational Savings Plan Trust**

## **Basic Financial Statements**

**Exhibit A**

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Office of Treasurer of State  
Iowa Educational Savings Plan Trust

## Statement of Fiduciary Net Position

June 30, 2025

**Assets**

Cash	\$	3,356,527
Investments		<u>7,380,067,818</u>
Total assets		7,383,424,345

**Liabilities**

Accounts payable		<u>173,641</u>
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**Net position**

Restricted for others	\$	<u>7,383,250,704</u>
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See notes to financial statements.

Office of Treasurer of State  
Iowa Educational Savings Plan Trust

Statement of Changes in Fiduciary Net Position

Year ended June 30, 2025

Additions:		
Contributions from participants		\$ 518,120,320
Net increase in fair value of investments		770,503,260
Administrative fees		1,955,766
Investment income		<u>156,046</u>
Total additions		<u>1,290,735,392</u>
Deductions:		
Distributions to participants and beneficiaries		736,278,259
Administrative expenses:		
Salaries	\$ 248,651	
Travel	17,100	
Supplies	163,187	
Contractual services for outside consultants and independent contractors	106,952	
Other contractual services	20,447	
Software maintenance	5,825	
Marketing	<u>2,227,396</u>	
Total deductions		<u>2,789,558</u>
Net increase in fiduciary net position		551,667,575
Net position beginning of year		<u>6,831,583,129</u>
Net position end of year		<u>\$ 7,383,250,704</u>

See notes to financial statements.

Office of Treasurer of State  
Iowa Educational Savings Plan Trust

Notes to Financial Statements

June 30, 2025

**(1) Summary of Significant Accounting Policies**

The Iowa Educational Savings Plan Trust (Trust) is a part of the Office of Treasurer of State of Iowa. The Trust was created in 1998 by the General Assembly under Chapter 12D of the Code of Iowa, with the Treasurer of State as the trustee. According to Chapter 12D of the Code of Iowa, the General Assembly finds the general welfare and well-being of the state are directly related to educational levels and skills of the citizens of the state and a vital and valid public purpose is served by the creation and implementation of programs which encourage and make possible the attainment of higher education by the greatest number of citizens of the state.

The purpose of the Trust is to allow participants to invest money for future payment of education costs for designated beneficiaries. In 2018, Chapter 12D of the Code of Iowa was amended to include elementary and secondary school expenses for tuition in connection with enrollment or attendance at an elementary or secondary public, private or religious school.

Two 529 plans are administered under the Trust. The ISave Plan was established in 1998 to be sold directly to the public. The Iowa Advisor 529 Plan was established in 2006 to be sold through financial advisors.

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. Reporting Entity

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. Measurement Focus, 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 education costs of designated beneficiaries.

### C. Capital Assets

Capital assets are defined by the Trust as assets with initial, individual costs in excess of \$5,000. Such assets are recorded at historical cost. Depreciation of all exhaustible assets is charged as an expense against operations. Depreciation is computed using the straight-line method over the estimated useful lives of the assets. Capital assets are depreciated over a five-year life.

The cost of normal maintenance and repair that do not add to the value of the asset or materially extend asset lives are not capitalized.

### **(2) Deposits and Investments**

The Trust's administrative funds deposited at Wells Fargo are insured up to \$250,000 through federal depository insurance. The Trust's remaining cash and investments are not bank deposits and are not insured by 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.

Although money contributed to the Trust is invested in portfolios which hold mutual funds, neither the Trust nor any of its portfolios is itself a mutual fund. Each portfolio invests in one or more mutual funds, which are actively traded publicly.

The portfolios' investments valuation is based on the fair value hierarchy established by 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, 2025, the portfolios' investments, except for the interest accumulation portfolio, were classified as Level 1.

The interest accumulation portfolio in the ISave 529 Plan directs all of its assets into the Vanguard Short-Term Reserves Account. This account is composed of traditional and synthetic funding agreements with insurance companies and Vanguard Federal Money Market Fund. The funding agreements, which are held in the name of the Trustee for the Trust, are unallocated insurance contracts that are nonparticipating interest-earning investment contracts, as defined in Governmental Accounting Standards Board, Statement No. 59 Financial Instruments Omnibus and Governmental Accounting Standards Board, Statement No. 31, Accounting and Financial Reporting for Certain Investments and for External Investment Pools. Accordingly, these agreements are reported at contract value for purposes of determining the ISave 529 Plan's value in the investment pool due to the fact that the terms of the funding agreements are such that the contract value does not change when interest rates increase or decline. Contract value is equal to the initial required contribution amount, plus interest credited each month at the contractual rate, less withdrawals and expenses. As of June 30, 2025, the interest accumulation portfolio investments were classified as Level 2.

ISave 529 Plan

The Office of Treasurer of State has an agreement with the Vanguard Group to invest funds for the Trust in specified investment portfolios. The Trust's investments at June 30, 2025 are all invested in portfolios which hold Vanguard mutual funds for the ISave 529 Plan.

The Office of Treasurer of State has established four age-based savings tracks and ten individual portfolios for the participant to select from. For the age-based savings tracks, participant accounts will be exchanged (units held will be exchanged for a number of units of equal value) for the next portfolio in the year the beneficiary reaches the minimum qualifying age in the next portfolio.

Ages	Aggressive Growth Track	Growth Track	Moderate Growth Track	Conservative Growth Track
Age 5 and younger	Aggressive Growth	Aggressive Growth	Growth	Moderate Growth
Age 6 through 7	Aggressive Growth	Blended Aggressive Growth	Blended Growth	Blended Moderate Growth
Age 8 through 9	Aggressive Growth	Growth	Moderate Growth	Conservative Growth
Age 10 through 11	Blended Aggressive Growth	Blended Growth	Blended Moderate Growth	Blended Conservative Growth
Age 12 through 13	Growth	Moderate Growth	Conservative Growth	Income
Age 14	Blended Growth	Blended Moderate Growth	Blended Conservative Growth	Blended Income
Age 15	Moderate Growth	Conservative Growth	Blended Conservative Growth	Blended Income
Age 16	Blended Moderate Growth	Blended Conservative Growth	Income	Conservative Income
Age 17	Conservative Growth	Income	Income	Conservative Income
Age 18	Blended Conservative Growth	Blended Income	Blended Income	Conservative Income
Age 19 and older	Income	Conservative Income	Interest Accumulation	Interest Accumulation

At June 30, 2025, the ISave 529 Plan had investments in the following portfolios:

Investment Portfolio	Fair Value at June 30, 2025
Fair Value:	
Aggressive Growth	\$ 1,222,737,745
Blended Aggressive Growth *	263,516,473
Growth	602,902,896
Blended Growth *	260,030,054
Moderate Growth	474,804,645
Blended Moderate Growth *	266,808,862
Conservative Growth	381,420,506
Blended Conservative Growth *	328,716,320
Income	774,206,103
Blended Income *	152,255,188
Conservative Income	428,065,741
Short-term bond index	10,312,231
Bond Index	54,778,014
Domestic Stock Index	784,260,707
International Bond Index	1,088,406
International Stock Index	80,094,895
Contract Value:	
Interest Accumulation	511,374,825
Total	<u>\$ 6,597,373,611</u>

\* Not available as an individual portfolio option.

### Iowa Advisor 529 Plan

Accounts for the Iowa Advisor 529 Plan are invested at the direction of the account owner with the assistance of a financial advisor.

The Office of Treasurer of State has an agreement with Voya Investment Management Co. LLC (Voya IM) to invest funds for the Iowa Educational Savings Plan Trust in specified investment portfolios. Currently, account owners in the Iowa Advisor 529 Plan have 20 investment options, all of which are managed by Voya IM.

The options open to investors as of June 30, 2025 include 11 single fund options, 4 static allocation options (investments remain in the same investment option) and 5 age-based options (the investments automatically become more conservative as the child ages).

At June 30, 2025, the Iowa Advisor 529 Plan had investments in the following portfolios:

<u>Investment Portfolio</u>	<u>Fair Value at June 30, 2025</u>
IAdvisor 529 Aggressive Option	\$ 140,432,525
IAdvisor 529 Growth Option	113,837,295
IAdvisor 529 Moderate Option	38,236,878
IAdvisor 529 Conservative Option	17,219,405
IAdvisor 529 Age 0-5 Option	33,322,182
IAdvisor 529 Age 6-10 Option	72,232,741
IAdvisor 529 Age 11-15 Option	82,834,917
IAdvisor 529 Age 16-17 Option	34,182,282
IAdvisor 529 Age 18+ Option	41,155,125
Voya Large Cap Value Option	19,025,445
Voya Large Cap Growth Option	69,697,326
Voya Mid Cap Opportunities Option	15,068,271
Voya Multi-Manager Mid Cap Value Option	6,658,891
Voya Intermediate Bond Option	7,942,679
Voya Short Term Bond Option	2,477,755
Voya Government Money Market Option	25,593,752
Voya International Index Option *	2,763,157
Voya US Stock Index Option	44,223,528
Voya Multi-Manager International Equity Option	7,949,226
Voya JPMorgan Small Cap Core Equity Option	7,840,827
Total	<u>\$ 782,694,207</u>

\* Not available to new investors

**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 ISave 529 Plan and the Iowa Advisor 529 Plan contain underlying fixed income investments subject to interest rate risk disclosure. The exposure is summarized using the effective duration methodology, as follows:

ISave 529 Plan Investment Portfolio	Underlying Fixed Income Funds					Fair Value of Funds at June 30, 2025
	Vanguard Total Bond Market Index	Vanguard Total Bond Market II Index	Vanguard Short-term Inflation Protected Securities Index	Vanguard Total International Bond Index		
Blended Aggressive Growth	\$ -	18,286,771	-	7,748,390		26,035,161
Growth	-	78,357,644	-	32,599,953		110,957,597
Blended Growth	-	54,030,756	-	22,829,654		76,860,410
Moderate Growth	-	127,745,230	-	54,648,604		182,393,834
Blended Moderate Growth	-	88,824,684	-	37,380,068		126,204,752
Conservative Growth	-	159,049,070	-	67,428,975		226,478,045
Blended Conservative Growth	-	159,912,879	-	67,510,686		227,423,565
Income	-	432,457,654	-	182,939,908		615,397,562
Blended Income	-	95,933,296	-	40,812,420		136,745,716
Conservative Income	-	147,995,306	76,461,830	95,660,765		320,117,901
Bond Index	54,806,595	-	-	-		54,806,595
Total	\$ 54,806,595	1,362,593,290	76,461,830	609,559,423		2,103,421,138
Effective Duration (Years) as of June 30, 2025:	<u>5.9</u>	<u>5.9</u>	<u>2.4</u>	<u>7.0</u>		

Iowa Advisor 529 Plan Investment Portfolio	Underlying Fixed Income Funds					Fair Value of Funds at June 30, 2025
	VY BlackRock Inflation Protected Bond Fund	Voya High Yield Bond Fund	Voya Intermediate Bond Fund	Voya Short Term Bond Fund	VY Brandywine Global-Bond Portfolio	
IAdvisor 529 Aggressive	\$ -	2,723,013	6,817,894	-	-	9,540,907
IAdvisor 529 Growth	-	4,436,217	12,218,399	-	3,326,427	19,981,043
IAdvisor 529 Moderate	1,116,836	1,499,373	7,133,057	1,110,964	1,873,842	12,734,072
IAdvisor 529 Conservative	506,568	850,079	4,767,820	1,511,713	1,359,865	8,996,045
IAdvisor Age 0-5 Option	-	-	2,922,671	-	972,558	3,895,229
IAdvisor Age 6-10 Option	2,103,732	2,118,232	11,314,409	1,395,093	2,117,775	19,049,241
IAdvisor Age 11-15 Option	3,240,279	2,447,221	22,057,621	5,640,751	6,524,033	39,909,905
IAdvisor Age 16-17 Option	1,348,377	1,357,800	9,858,875	8,047,837	3,393,679	24,006,568
IAdvisor Age 18+ Option	2,048,127	2,475,246	11,981,141	16,299,707	4,124,024	36,928,245
Voya Intermediate Bond	-	-	7,947,817	-	-	7,947,817
Voya Short Term Bond	-	-	-	2,479,888	-	2,479,888
Total	\$ 10,363,919	17,907,181	97,019,704	36,485,953	23,692,203	185,468,960
Effective Duration (Years) as of June 30, 2025:	<u>6.8</u>	<u>4.32</u>	<u>5.91</u>	<u>2.07</u>	<u>7.84</u>	

### (3) Participant Contributions

Any United States citizen age 18 years or older with a valid social security number and a desire to save for the educational expenses of a person may be a participant. The amount a participant may contribute is unlimited, except no contribution may cause the aggregate balance of all accounts held on behalf of a single beneficiary to exceed \$505,000 (in 2025). The minimum amount of any one contribution is \$25 (\$15 when investing through a payroll deduction plan) under the ISave 529 Plan and \$50 (\$25 when investing through a payroll deduction plan) under the Iowa Advisor 529 Plan. Contributions are not required to be made each year.

Participant contributions up to \$5,800 per account in 2025 are deductible for State of Iowa income tax purposes. Earnings are tax exempt for Iowa state income tax purposes. A similar federal tax deduction does not exist for the participant's contributions. Earnings are exempt for federal income tax purposes if funds are spent for specified qualified education 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) Capital Assets

A summary of capital assets activity for the year ended June 30, 2025 is as follows:

	Balance			Balance
	Beginning			End
	of Year	Additions	Deletions	of Year
Equipment	\$ 20,716	-	-	20,716
Less accumulated depreciation	(20,716)	-	-	(20,716)
Capital assets, net	\$ -	-	-	-

### (5) Administrative Fees

Chapter 12D.2(14) 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 participants and beneficiaries. The assets of the Trust shall not be transferred or used by the state for any purposes other than the purposes of the Trust.

For the ISave 529 Plan, Ascensus provides an administrative fee of 0.02% of assets under management by Vanguard for the ISave 529 Plan. For the Iowa Advisor 529 Plan, Voya IM provides an administrative fee of 0.10% of assets under management. The administrative fees received by the Trust for fiscal year 2025 totaled \$1,955,766.

**Office of Treasurer of State  
Iowa Educational Savings Plan Trust**

**Supplementary Information**

**Schedule 1**

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Office of Treasurer of State  
Iowa Educational Savings Plan Trust

## Combining Schedule of Fiduciary Net Position

June 30, 2025

	ISave 529 Plan	Iowa Advisor 529 Plan	Administrative Account	Total
<b>Assets</b>				
Cash	\$ -	-	3,356,527	3,356,527
Investments	6,597,373,612	782,694,206	-	7,380,067,818
Total assets	6,597,373,612	782,694,206	3,356,527	7,383,424,345
<b>Liabilities</b>				
Accounts payable	-	-	173,641	173,641
<b>Net position</b>				
Restricted for others	\$ 6,597,373,612	782,694,206	3,182,886	7,383,250,704

See accompanying independent auditor's report.

Office of Treasurer of State  
Iowa Educational Savings Plan Trust

Combining Schedule of Changes in Fiduciary Net Position

Year ended June 30, 2025

	ISave 529 Plan	Iowa Advisor 529 Plan	Administrative Account	Total
Additions:				
Contributions from participants	\$ 438,801,109	79,319,211	-	518,120,320
Net increase in fair value of investments	690,068,536	80,434,724	-	770,503,260
Administrative fees	-	-	1,955,766	1,955,766
Investment income	-	-	156,046	156,046
Total additions	<u>1,128,869,645</u>	<u>159,753,935</u>	<u>2,111,812</u>	<u>1,290,735,392</u>
Deductions:				
Distributions to participants and beneficiaries	670,446,275	65,831,984	-	736,278,259
Administrative expenses:				
Salaries	-	-	248,651	248,651
Travel	-	-	17,100	17,100
Supplies	-	-	163,187	163,187
Contractual services for outside consultants and independent contractors	-	-	106,952	106,952
Other contractual services	-	-	20,447	20,447
Software maintenance	-	-	5,825	5,825
Marketing	-	-	2,227,396	2,227,396
Total deductions	<u>670,446,275</u>	<u>65,831,984</u>	<u>2,789,558</u>	<u>739,067,817</u>
Net increase in fiduciary net position	458,423,370	93,921,951	(677,746)	551,667,575
Net position beginning of year	<u>6,138,950,242</u>	<u>688,772,255</u>	<u>3,860,632</u>	<u>6,831,583,129</u>
Net position end of year	<u>\$ 6,597,373,612</u>	<u>782,694,206</u>	<u>3,182,886</u>	<u>7,383,250,704</u>

See accompanying independent auditor's report.

**Schedule 3**

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Office of Treasurer of State  
Iowa Educational Savings Plan Trust

Summary of Expenses for Outside Consultants and Independent Contractors

Year ended June 30, 2025

<u>Type of Service</u>	<u>Amount</u>
Legal consulting services	\$ 42,323
Other professional services	<u>64,629</u>
Total	<u>\$ 106,952</u>

See accompanying independent auditor's report.

Office of Treasurer of State  
Iowa Educational Savings Plan Trust

Summary of Distributions to Participants and Beneficiaries

Year ended June 30, 2025

Type of Distribution	ISave 529 Plan	Iowa Advisor 529 Plan	Total
Withdrawals from the plan	\$ 631,398,609	34,964,199	666,362,808
Rollover withdrawals to other qualified state tuition plans	39,047,666	3,634,393	42,682,059
Omnibus - All distribution types	-	27,233,392	27,233,392
Total	<u>\$ 670,446,275</u>	<u>65,831,984</u>	<u>736,278,259</u>

See accompanying independent auditor's report.



**OFFICE OF AUDITOR OF STATE  
STATE OF IOWA**

Rob Sand  
Auditor of State

State Capitol Building  
Des Moines, Iowa 50319-0006  
Telephone (515) 281-5834

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 Roby Smith, Treasurer of State:

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Governmental Auditing Standards, issued by the Comptroller General of the United States, the financial statements of the Office of Treasurer of State, Iowa Educational Savings Plan Trust, as of and for the year ended June 30, 2025, 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, 2025.

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 Educational 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 Educational Savings Plan Trust's internal control. Accordingly, we do not express an opinion on the effectiveness of the Office of Treasurer of State, Iowa Educational 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 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 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 Educational 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 Government Auditing Standards.

### Purpose of this Report

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

We would like to acknowledge the many courtesies and assistance extended to us by personnel of the Office of Treasurer of State, Iowa Educational 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.



Brian R. Brustkern, CPA  
Deputy Auditor of State

October 7, 2025

Office of Treasurer of State  
Iowa Educational Savings Plan Trust

Staff

This audit was performed by:

Brian R. Brustkern, CPA, Deputy  
Alex N. Kawamura, CPA, Manager  
Enoch Duval, Senior Auditor  
Matthew W. Beerman, Staff Auditor  
Jennifer H. Wagner, Staff Auditor