



Financial Statements  
June 30, 2020 and 2019

# North Dakota Student Loan Trust

# NORTH DAKOTA STUDENT LOAN TRUST

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## Independent Auditor's Report

Governor of North Dakota  
and the Legislative Assembly  
State of North Dakota  
Bismarck, North Dakota

### Report on the Financial Statements

We have audited the accompanying financial statements of the North Dakota Student Loan Trust (the Trust), an enterprise fund of the State of North Dakota, as of and for the years ended June 30, 2020 and 2019, and the related notes to the financial statements, which collectively comprise the Trust's basic financial statements as listed in the table of contents

### Management's Responsibility for the Financial Statements

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

### Auditor's Responsibility

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

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

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

## **Opinions**

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the North Dakota Student Loan Trust, as of June 30, 2020 and 2019, and the respective changes in its financial position and its cash flows thereof for the years then ended in accordance with accounting principles generally accepted in the United States of America.

## **Emphasis of Matter**

As discussed in Note 1, the financial statements of the Trust are intended to present the financial position, the changes in financial position and cash flows of only that portion of the State of North Dakota that is attributable to the transactions of the Trust. They do not purport to, and do not, present fairly the financial position of the State of North Dakota as of June 30, 2020 and 2019, and the changes in its financial position and cash flows for the years then ended in conformity with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

## **Other Matters**

### *Required Supplementary Information*

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis on pages 4 through 8 be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

### *Other Information*

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Trust's basic financial statements. The combining statements of net position and combining statements of revenues, expenses, and changes in net position are presented for purposes of additional analysis and are not a required part of the financial statements.

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

**Other Reporting Required by Government Auditing Standards**

In accordance with Government Auditing Standards, we have also issued our report dated November 12, 2020 on our consideration of the Trust's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, 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 Trust's internal control over financial reporting and compliance.

*Eide Bailly LLP*

Bismarck, North Dakota  
November 12, 2020

**NORTH DAKOTA STUDENT LOAN TRUST**  
**MANAGEMENT'S DISCUSSION AND ANALYSIS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

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The discussion and analysis of the financial performance of the North Dakota Student Loan Trust (Trust) that follows is meant to provide additional insight into the Trust's activities for the years ended June 30, 2020 and 2019. Please read it in conjunction with the Trust's financial statements and footnotes, which are presented within this report.

**FINANCIAL HIGHLIGHTS:**

Section 54-17-24 of the North Dakota Century Code authorized the establishment of the North Dakota Student Loan Trust. On June 27, 1979, the Commission adopted the North Dakota Student Loan Revenue Bonds General Bond Resolution establishing the North Dakota Student Loan Trust fund. On June 19, 1996, the Commission adopted the Second General Bond Resolution and the First Supplemental Resolution to the North Dakota Student Loan Revenue Bonds - Second General Bond Resolution. The purpose of the Trust is to provide loans to students in post-secondary education. The Trust acquires eligible loans insured or guaranteed, respectively, by the United States government or the North Dakota Guaranteed Student Loan Program. All guaranteed loans and the collections and earnings therefrom are pledged as collateral to the outstanding bonds of the respective trusts.

During fiscal years 2020 and 2019, the Trust had no sales or purchases of loans. During the fiscal year ended June 30, 2018, the Trust sold Federal Student Loans to the Bank of North Dakota (Bank) in the amount of \$12,693. The sale or liquidation of up to \$16,592 of student loans was approved by the Industrial Commission to provide for the appropriations that were approved by the 2017 legislature. The Bank, as sole remaining bondholder of the Trust bonds, consented to the sale.

DEAL loans are available at either a fixed rate or a variable rate with the rates being adjusted quarterly. As of July 1, 2020, the fixed rate was 3.39% and the variable rate was 1.80%. As of July 1, 2019, the fixed rate was 4.74% and the variable rate was 3.93%. As of July 1, 2018, the fixed rate was 5.45% and the variable rate was 3.84%.

The Trust 2020 statement of net position indicates that the Trust continues to have adequate resources to provide for bond repayment and continuing operations. There are \$1,550 of current assets available to meet the next fiscal year's obligations of approximately \$49. The income before transfers of \$21 reflected in the statement of revenues, expenses, and changes in fund net position illustrates that the Trust's revenues continue to exceed its expenditures.

**REQUIRED FINANCIAL STATEMENTS:**

The management discussion and analysis is intended to serve as an introduction to the Trust's financial statements. The Trust is accounted for utilizing fund accounting and includes the requirements of 1) the General Bond Resolution Fund and 2) the Second General Bond Resolution Fund. Note 1 to the financial statements provides a description of the organization, funds and significant accounting policies. The financial statements of the Trust provide accounting information similar to that of many other business entities. The Statement of Net Position summarizes the assets and liabilities, with the difference between the two reported as net position. It also serves as the basis for analysis of the soundness and liquidity of the Trust. The Statement of Revenues, Expenses and Changes in Net Position summarizes the Trust's operating performance for the year. The Statement of Cash Flows summarizes the flow of cash through the Trust as it conducts its business.

**MANAGEMENT'S DISCUSSION AND ANALYSIS**  
**(In Thousands)**

	<u>2020</u>	<u>2019</u>	<u>2018</u>
<b>ASSETS</b>			
CURRENT ASSETS - UNRESTRICTED	\$ 16	\$ 10	\$ 8,408
CURRENT ASSETS - RESTRICTED	1,534	1,387	1,500
NONCURRENT ASSETS - UNRESTRICTED	<u>698</u>	<u>816</u>	<u>866</u>
TOTAL ASSETS	<u>\$ 2,248</u>	<u>\$ 2,213</u>	<u>\$ 10,774</u>
<b>LIABILITIES</b>			
CURRENT LIABILITIES	\$ 49	\$ 24	\$ 8,896
NONCURRENT LIABILITIES	<u>1,000</u>	<u>1,000</u>	<u>1,000</u>
TOTAL LIABILITIES	<u>1,049</u>	<u>1,024</u>	<u>9,896</u>
<b>NET POSITION</b>			
RESTRICTED FOR DEBT SERVICE	487	379	455
UNRESTRICTED	<u>712</u>	<u>810</u>	<u>423</u>
TOTAL NET POSITION	<u>1,199</u>	<u>1,189</u>	<u>878</u>
TOTAL LIABILITIES AND NET POSITION	<u>\$ 2,248</u>	<u>\$ 2,213</u>	<u>\$ 10,774</u>

## MANAGEMENT'S DISCUSSION AND ANALYSIS (In Thousands)

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### *Significant Statement of Net Position Changes*

Total assets of the Trust increased \$35 in 2020, primarily due to interest earned on student loans. Total assets of the Trust declined by \$8,561 in 2019, primarily due to Legislative appropriations paid to other state agencies. Total student loan receivables declined by \$13,835 to \$1,117 in 2018, primarily due to the sale of \$12,693 of Federal student loans to the Bank.

There were no new bonds issued in 2020, 2019 or 2018. No principal payments were made during the fiscal years ended June 30, 2020, 2019 and 2018.

### *Cash, Cash Equivalents and Investments*

Trust cash, cash equivalents and investments, which are included in restricted assets, are restricted for the debt service of bond issues for the General Bond Resolution and Second General Bond Resolution purposes listed in Note 1 to the financial statements.

Trust cash, cash equivalents and investments, which are included in unrestricted assets, are unrestricted within the Trust for the overall uses of the General Bond Resolution and Second General Bond Resolution purposes listed in Note 1 to the financial statements.

### *Student Loans Receivable*

The student loans receivable is included in current and noncurrent assets of the statement of net position. As of June 30, 2020, all student loans are insured by the North Dakota Guaranteed Student Loan Program (GSL). All guaranteed loans and the collections and earnings therefrom are pledged as collateral to the outstanding bonds of the respective trusts. Additional discussion can be found in Notes 1 and 4 to the financial statements.

### *Appropriation Payable*

The 2019 North Dakota Legislature did not pass any legislation impacting the Trust. Administration expenses of \$96 will be paid to the Industrial Commission for the biennium beginning July 1, 2019 and ending June 30, 2021. The 2017 North Dakota Legislature passed House Bill 1013 and Senate Bills 2003, 2004, 2014, 2144, and 2224 which provide for appropriations of \$16,592 from the Trust to other state agencies during the biennium beginning July 1, 2017 and ending June 30, 2019. As of June 30, 2019, \$14 was reflected as an appropriation payable for payments to be made after the close of the biennium. See also Note 6 to the financial statements.

### *Bonds Payable*

The Trust has issued bonds in order to facilitate the purchase of student loans. The bonds payable are included in the current and noncurrent liabilities of the preceding statement. The bonds are direct obligations of the Trust and are secured by student loans purchased under the applicable resolutions, interest earnings and certain accounts established pursuant to the applicable bond resolutions. Note 5 to the financial statements provides a detailed listing of all the bonds outstanding.



**MANAGEMENT'S DISCUSSION AND ANALYSIS**  
**(In Thousands)**

*Net Position*

The Restricted Net Position of the North Dakota Student Loan Trust is restricted by bond resolutions for the repayment of bond interest and principal. Monies held in surplus accounts can be used to redeem or purchase bonds, finance student loans, or upon certification from the Industrial Commission of North Dakota, fund a guarantee agency's guarantee program.

**CONDENSED STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET POSITION**  
**YEARS ENDED JUNE 30, 2020, 2019, AND 2018**

	<u>2020</u>	<u>2019</u>	<u>2018</u>
OPERATING REVENUES			
Interest on student loans	\$ 63	\$ 70	\$ 195
Special allowance and interest subsidy	-	-	22
Total operating revenues	<u>63</u>	<u>70</u>	<u>217</u>
OPERATING EXPENSES			
Interest	23	31	22
Service fees	3	9	84
Other	23	29	(27)
Total operating expenses	<u>49</u>	<u>69</u>	<u>79</u>
OPERATING INCOME	14	1	138
NONOPERATING REVENUE	<u>7</u>	<u>14</u>	<u>20</u>
INCOME BEFORE TRANSFERS	21	15	158
TRANSFERS	<u>(11)</u>	<u>296</u>	<u>(16,679)</u>
CHANGE IN NET POSITION	10	311	(16,521)
TOTAL NET POSITION, BEGINNING OF YEAR	<u>1,189</u>	<u>878</u>	<u>17,399</u>
TOTAL NET POSITION, END OF YEAR	<u>\$ 1,199</u>	<u>\$ 1,189</u>	<u>\$ 878</u>

Note 1 to the financial statements contains discussion of several of the various operating revenue and expense items pertaining to the Trust.

## **MANAGEMENT'S DISCUSSION AND ANALYSIS**

### **(In Thousands)**

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#### *Special Allowance and Interest Subsidy*

Prior to the Federal loan sale, the U.S. Department of Education provided a special allowance, which was a subsidy to lenders participating in the Guaranteed Student Loan Program. Also, the U.S. Department of Education paid the Trust the interest earned on subsidized student loans from the date of inception until the end of the grace or deferment period. All Federal student loans were sold in October of 2017.

#### *Transfers*

Net transfers of \$11 during the fiscal year 2020 reflect transfers to the North Dakota Industrial Commission of \$96, offset by the \$85 in unused funds returned to the Trust from the State Board of Higher Education in the 2017-2019 biennium. Transfers of \$296 during the fiscal year 2019 reflect the unutilized portion of appropriations authorized by the 2017 Legislature. Transfers of \$16,592 during the fiscal year 2018 reflect appropriations authorized by the 2017 Legislature to the Department of Public Instruction, State Board of Higher Education, Department of Health, and Department of Commerce. Of the \$16,592 of the transfers, the Trust paid \$7,748 to these agencies during the fiscal year 2018 and the remaining \$8,843 was reflected as an appropriation payable. Transfers of \$87 to the North Dakota Industrial Commission are also reflected in the fiscal year 2018 financial statements.

## **ECONOMIC FACTORS AND FUTURE OUTLOOK**

There was no legislation impacting the Trust during the 2019 Legislative Session. The Trust continues to have adequate cashflow from student loan repayments to meet its future obligations.

As a result of the spread of the COVID-19 coronavirus, economic uncertainties have arisen which are likely to negatively impact net interest income. Other financial impact could occur though such potential impact is unknown at this time.

## **CONTACTING THE NORTH DAKOTA STUDENT LOAN TRUST'S FINANCIAL MANAGEMENT**

The information in this report is intended to provide the reader with an overview of the Trust's operations along with the Trust's accountability for those operations. Questions concerning any of the information provided in this report or requests for additional financial information should be addressed to the North Dakota Industrial Commission, North Dakota Student Loan Trust, 600 East Boulevard Avenue, Department 405, Bismarck, ND 58505-0840.

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**NORTH DAKOTA STUDENT LOAN TRUST**  
**STATEMENTS OF NET POSITION**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

	<u>2020</u>	<u>2019</u>
<b>ASSETS</b>		
<b>CURRENT ASSETS - UNRESTRICTED</b>		
Due from other state agencies	\$ 16	\$ 10
<b>CURRENT ASSETS - RESTRICTED</b>		
Cash and cash equivalents	392	225
Investments	1,000	1,000
Student loans receivable	142	162
Total restricted current assets	<u>1,534</u>	<u>1,387</u>
<b>NONCURRENT ASSETS - UNRESTRICTED</b>		
Student loans receivable	<u>698</u>	<u>816</u>
Total assets	<u>\$ 2,248</u>	<u>\$ 2,213</u>

See Notes to Financial Statements

	<u>2020</u>	<u>2019</u>
<b>LIABILITIES AND NET POSITION</b>		
<b>CURRENT LIABILITIES</b>		
Due to other state agencies	\$ 47	\$ -
Accrued interest payable	-	3
Accrued fees payable - related party	2	7
Appropriation payable	-	14
	<u>49</u>	<u>24</u>
<b>NONCURRENT LIABILITIES</b>		
Bonds payable	<u>1,000</u>	<u>1,000</u>
	<u>1,049</u>	<u>1,024</u>
<b>NET POSITION</b>		
Restricted for debt service	487	379
Unrestricted	<u>712</u>	<u>810</u>
	<u>1,199</u>	<u>1,189</u>
	<u>\$ 2,248</u>	<u>\$ 2,213</u>

**NORTH DAKOTA STUDENT LOAN TRUST**  
**STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET POSITION**  
**YEARS ENDED JUNE 30, 2020 and 2019**  
**(In Thousands)**

	<u>2020</u>	<u>2019</u>
<b>OPERATING REVENUES</b>		
Interest on student loans	\$ 63	\$ 70
<b>OPERATING EXPENSES</b>		
Interest	23	31
Service fees	3	9
Administration fees	1	1
Bond related expenses	22	28
Total operating expenses	<u>49</u>	<u>69</u>
<b>OPERATING INCOME</b>	14	1
<b>NONOPERATING REVENUE</b>		
Investment income	<u>7</u>	<u>14</u>
<b>INCOME BEFORE TRANSFERS</b>	21	15
<b>TRANSFERS - STATE AGENCIES</b>	<u>(11)</u>	<u>296</u>
<b>CHANGE IN NET POSITION</b>	10	311
<b>TOTAL NET POSITION, BEGINNING OF YEAR</b>	<u>1,189</u>	<u>878</u>
<b>TOTAL NET POSITION, END OF YEAR</b>	<u>\$ 1,199</u>	<u>\$ 1,189</u>

**NORTH DAKOTA STUDENT LOAN TRUST**  
**STATEMENTS OF CASH FLOWS**  
**YEARS ENDED JUNE 30, 2020 and 2019**  
**(In Thousands)**

	<u>2020</u>	<u>2019</u>
OPERATING ACTIVITIES		
Receipts of student loan repayments	\$ 193	\$ 216
Payments to state agency service providers	(9)	(11)
Payments to other service providers	<u>(22)</u>	<u>(28)</u>
NET CASH FROM OPERATING ACTIVITIES	<u>162</u>	<u>177</u>
NON-CAPITAL FINANCING ACTIVITIES		
Bond interest payments	(25)	(30)
Transfer to North Dakota Industrial Commission	(48)	(43)
Transfers - State Agencies	<u>71</u>	<u>(8,534)</u>
NET CASH USED FOR NON-CAPITAL FINANCING ACTIVITIES	<u>(2)</u>	<u>(8,607)</u>
INVESTING ACTIVITIES		
Investment interest received	7	18
Purchase of investment securities	(1,000)	(6,000)
Proceeds from sale and maturity of investment securities	<u>1,000</u>	<u>13,670</u>
NET CASH FROM INVESTING ACTIVITIES	<u>7</u>	<u>7,688</u>
NET CHANGE IN CASH AND CASH EQUIVALENTS	167	(742)
CASH AND CASH EQUIVALENTS, BEGINNING OF YEAR	<u>225</u>	<u>967</u>
CASH AND CASH EQUIVALENTS, END OF YEAR	<u><u>\$ 392</u></u>	<u><u>\$ 225</u></u>

**STATEMENTS OF CASH FLOWS – Page 2**  
**(In Thousands)**

	<u>2020</u>	<u>2019</u>
RECONCILIATION OF OPERATING INCOME		
TO NET CASH FROM OPERATING ACTIVITIES		
Operating income	\$ 14	\$ 1
Adjustments to reconcile operating income		
Reclassification of interest income		
and expense to other activities	67	77
Changes in assets and liabilities		
Student loans receivable	138	139
Interest receivable	-	3
Accrued interest payable	(3)	1
Due to other state agencies	(49)	-
Accrued fees payable - related party	(5)	(44)
NET CASH FROM OPERATING ACTIVITIES	<u>\$ 162</u>	<u>\$ 177</u>



**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

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**NOTE 1 - SIGNIFICANT ACCOUNTING POLICIES**

*Nature of Operations*

Section 54-17-24 of the North Dakota Century Code authorized the establishment of the North Dakota Student Loan Trust (Trust). On June 27, 1979, the Commission adopted the North Dakota Student Loan Revenue Bonds General Bond Resolution establishing the North Dakota Student Loan Trust fund. On June 19, 1996, the Commission adopted the Second General Bond Resolution and the First Supplemental Resolution to the North Dakota Student Loan Revenue Bonds - Second General Bond Resolution. The purpose of the Trust is to provide loans to students in post-secondary education. The Trust acquires eligible loans insured or guaranteed, respectively, by the United States government or the North Dakota Guaranteed Student Loan Program. All guaranteed loans and the collections and earnings therefrom are pledged as collateral to the outstanding bonds of the respective trusts.

*Reporting Entity*

In accordance with Governmental Accounting Standards Board (GASB) Statement No. 61, *The Financial Reporting Entity: Omnibus*, the Trust should include all component units over which the Trust exercises such aspects as (1) appointing a voting majority of an organization's governing body and (2) has the ability to impose its will on that organization or (3) the potential for the organization to provide specific financial benefits to, or impose specific financial burdens on the Trust.

Based on that criteria, no organizations were determined to be part of the reporting entity. The Trust is included as part of the primary government in the State of North Dakota's reporting entity.

*Accounting Standards and Adoptions of Accounting Policies*

The Trust follows the pronouncements of the Governmental Accounting Standards Board, which is the nationally accepted standard setting body for establishing generally accepted accounting principles for governmental entities.

*Fund Accounting*

The North Dakota Student Loan Trust consists of a trust fund, which is a separate accounting entity accounted for as an enterprise fund and uses the accrual basis of accounting. The fund is set up in accordance with the authorizing act, the bond resolutions and indenture. The fund consists of the First General Bond Resolution Fund, which includes the 2004 A student loan revenue bonds and the Second General Bond Resolution Fund. Proceeds of bonds are recorded in the fund and used to provide student loans to eligible students. The bond resolutions require the establishment of certain accounts and sub-accounts. Bond proceeds that are deposited in these accounts are invested in qualifying investments. Interest income, interest expense, special allowance and interest subsidy, and gain on redemption of bonds are recorded in this fund in accordance with the bond resolutions.

**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

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*Basis of Accounting and Measurement Focus*

The accounting and financial reporting treatment applied to a fund is determined by its measurement focus. All enterprise funds are accounted for using the economic resources measurement focus. With this measurement focus, all assets and liabilities associated with the operation of the Trust are included on the statement of net position. Net position is segregated into restricted and unrestricted components. The statement of revenues, expenses and changes in fund net position present increases (e.g. revenues) and decreases (e.g. expenses) in net total position. The statement of cash flows presents the cash flows for operating activities, non-capital financing activities, and investing activities.

*Use of Estimates*

In preparing financial statements in conformity with accounting principles generally accepted in the United States of America, management is required to make estimates and assumptions that affect the reported amounts of assets and liabilities as of the date of the statement of net position and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

*Significant Group Concentrations of Credit Risk*

Most of the Trust's activities are with student loan borrowers in the State of North Dakota.

*Cash and Cash Equivalents*

The Trust considers all cash and time deposit accounts with original maturities of three months or less to be cash and cash equivalents for purposes of reporting cash flows.

*Deposits and Investments*

Time deposits are carried at cost, as they are nonnegotiable certificates of deposits with redemption terms that do not consider market rates. Investment securities are carried at market value. Unrealized gains and losses due to fluctuations in market value are included in investment income.

*Restricted Assets and Restricted Net Position*

The assets and net position of the North Dakota Student Loan Trust are restricted by bond resolutions for the repayment of bond interest and principal.

Moneys held in surplus accounts (which are classified as unrestricted on the statement of net position) can be used to redeem or purchase bonds, finance student loans, or upon certification from the Industrial Commission of North Dakota (the Commission), fund a guarantee agency's guarantee program.

Expenses of the Trust are paid in accordance with the provisions of the General and Second General Bond Resolutions and the Series Resolutions. Expenses related to a specific bond series are paid from funds available within that particular resolution. When an expense is incurred for purposes for which both restricted and unrestricted net position is available, the Trust considers restricted funds to have been spent first.

**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

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*Operating and Non-Operating Revenues*

Operating revenues consist of interest income on loans. All other revenues that do not meet the above criteria are classified as non-operating.

**NOTE 2 - UNRESTRICTED NET ASSETS**

The assets and net position of the North Dakota Student Loan Trust contain restrictions by bond resolutions for the repayment of bond interest and principal.

As of June 30, 2020 and 2019, the unrestricted portions of the surplus accounts consist of the following:

	<u>2020</u>	<u>2019</u>
Due from other state agencies	\$ 16	\$ 10
Student loans receivable	698	816
Appropriation payable	<u>-</u>	<u>(14)</u>
	<u>\$ 714</u>	<u>\$ 812</u>

**NOTE 3 - DEPOSITS AND INVESTMENTS**

All funds have their monies invested in securities or deposits allowed by the General Bond Resolution establishing the Trust and the Second General Bond Resolution. Such moneys may be invested in: (1) direct obligations of or obligations guaranteed by the United States of America, (2) deposits of the Bank of North Dakota which are guaranteed as provided in North Dakota Century Code Section 6-09-10, (3) demand deposits and time deposits issued by banks, which are members of the Federal Deposit Insurance Corporation, (4) bonds, debentures, or notes or other evidences of indebtedness issued or guaranteed by any agency or instrumentality of the United States of America, (5) repurchase agreements or reverse repurchase agreements with banks, which are secured by securities which are obligations described in item (1) above, and (6) banker's acceptances of banks described in items (2) and (3) above.

*Deposits*

As of June 30, 2020 and 2019, the Trust had cash deposits of \$392 and \$225, respectively, with the Bank of North Dakota. The Trust also had time deposits of \$1,000 and \$1,000, respectively, with the Bank. For classification purposes on the Statement of Net Position, cash and cash equivalents were \$392 and \$225, respectively, and investments were \$1,000 and \$1,000 as of June 30, 2020 and 2019, respectively.

**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

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*Custodial and Concentration of Credit Risk*

Custodial credit risk for deposits is the risk that, in the event of the failure of a depository financial institution, the Trust will not be able to recover deposits or will not be able to recover collateral securities that are in the possession of an outside party. The Trust does not have a formal policy that limits custodial credit risk for deposits. None of the Trust's deposits are covered by depository insurance. The Trust's deposits are uncollateralized and all of the deposits are deposited in the Bank of North Dakota and are guaranteed by the State of North Dakota (NDCC Section 6-09-10).

**NOTE 4 - STUDENT LOANS RECEIVABLE**

The Trust has outstanding loans with annual fixed and variable interest rates. DEAL student loans are fully guaranteed by the North Dakota Guaranteed Student Loan Program, so there is no allowance for loan loss. Loan balances as of June 30, 2020 and 2019 total \$840 and \$978, respectively, with \$142 and \$162 designated as current assets.

Student loans are classified as student, deferred, repayment or claim status. The student status represents the period from the date the loan is made until a student is out of school, plus an authorized grace period. Deferred status represents a loan that has an authorized deferment of payment period. Repayment status indicates the loan is in repayment. Claim status represents those loans that have a claim filed with the guarantor.

As of June 30, 2020, there were \$535 in deferred status and \$305 in repayment status. The increase in deferment statuses is due to borrowers being offered up to a six-month deferment to reduce the financial burden of the COVID-19 pandemic. As of June 30, 2019, there were \$28 in deferred status and \$950 in repayment status.

**NOTE 5 - BONDS PAYABLE**

*Changes in Bonds Payable*

The following is a summary of the changes in bonds payable for the years ended June 30, 2020 and 2019:

	2020	2019
Balance, beginning of year	\$ 1,000	\$ 1,000
Principal payments on bonds	-	-
Balance, end of year	\$ 1,000	\$ 1,000
Amounts due within one year	\$ -	\$ -

**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

*Maturities of Bonds Payable*

The combined aggregate of future maturities and sinking fund requirements for all bonds is as follows:

<u>Year Ending June 30,</u>	<u>Principal</u>	<u>Interest</u>	<u>Total</u>
2021	\$ -	\$ 9	\$ 9
2022	-	9	9
2023	-	9	9
2024	-	9	9
2025	-	9	9
2026-2028	-	26	26
2029	1,000	9	1,009
	<u>\$ 1,000</u>	<u>\$ 80</u>	<u>\$ 1,080</u>

The following is a more detailed description of the individual bond issue that remains outstanding at June 30, 2020 and 2019.

	<u>Maturity Dates</u>	<u>Interest Rate</u>	<u>2020</u>	<u>2019</u>
General Bond Resolution Fund 2004 Series A	June 1, 2029	0.86% (1)	<u>\$ 1,000</u>	<u>\$ 1,000</u>
Less current portion			<u>-</u>	<u>-</u>
Noncurrent portion			<u>\$ 1,000</u>	<u>\$ 1,000</u>

(1) Variable on June 30, 2020.

**2004 SERIES A BONDS**

Interest is payable semiannually on June 1 and December 1 of each year. The 2004 Series A Bonds are variable rate bonds. The rate of interest is determined based on one-month LIBOR plus 0.7%. The maximum rate of interest is 12% per annum. Details of the terms and provisions of the variable rate bonds are outlined in Section 2.1 of the Fourth Supplemental Resolution to the State of North Dakota Student Loan Revenue Bonds First General Bond Resolution. Section 2.2 of the Fourth Supplemental Resolution to the State of North Dakota Student Loan Revenue Bonds First General Bond Resolution has deemed these to be Federally Taxable Bonds. The Series 2004 Bonds are subject to redemption prior to maturity at the option of the Commission from any source of funds, in whole or in part, on any date at a redemption price equal to 100% of the principal amount plus accrued interest to date of redemption.

**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

**NOTE 6 - INTERFUND AND RELATED PARTY TRANSACTIONS**

The North Dakota Student Loan Trust is related to the Bank of North Dakota through common management under the Industrial Commission of North Dakota. All cash and time deposits are deposited in the Bank of North Dakota. Interest receivable from the Bank of North Dakota totaled \$16 and \$10 as of June 30, 2020 and 2019 and is reflected as due from other state agencies on the statement of net position. Investment securities are held in safekeeping and all student loans are purchased from the Bank of North Dakota. The Bank of North Dakota also acts as the paying agent for the 2004 Series A Bonds. In addition, the Bank services the student loans held by the Trust, and maintains the accounting and other records for the Trust.

Fees expensed to the Bank of North Dakota for the following services included in the accompanying financial statements were as follows:

	<u>2020</u>	<u>2019</u>
Service fees	\$ 3	\$ 9
Administration fees	<u>1</u>	<u>1</u>
	<u>\$ 4</u>	<u>\$ 10</u>

Payables to the Bank of North Dakota for such fees amounting to \$2 and \$7 at June 30, 2020 and 2019 are included in "accrued fees payable - related party" on the statement of net position.

Net transfers of \$11 during the year ended June 30, 2020 reflect transfers to the North Dakota Industrial Commission of \$96, offset by the \$85 in unused funds returned to the Trust from the State Board of Higher Education in the 2017-2019 biennium. Net transfers of \$296 during the year ended June 30, 2020 reflect transfers to the North Dakota Industrial Commission of \$296. At June 30, 2020, \$47 was due to the North Dakota Industrial Commission and is reported as due to other state agencies on the statement of net position.

The 2017 North Dakota Legislature passed House Bill 1013 that provides for an appropriation of \$220 from North Dakota Student Loan Trust to the Department of Public Instruction for a one-time grant for North Dakota Governor's School Science, Technology, Engineering and Mathematics programs during the biennium beginning July 1, 2017 and ending June 30, 2019. During the biennium ended June 30, 2019, \$220 was paid to the Department of Public Instruction.

The 2017 North Dakota Legislature passed Senate Bill 2003 that provides for an appropriation of up to \$465 from the North Dakota Student Loan Trust to the State Board of Higher Education for the professional student exchange program, \$539 for the Connect ND Campus Solutions, \$500 for grants to Tribal Community Colleges and \$13,807 for residency positions at the University of North Dakota School of Medicine and Health Sciences during the biennium beginning July 1, 2017 and ending June 30, 2019. During the biennium ended June 30, 2019, \$372 was paid for the student exchange program, \$539 was paid for Connect ND Campus Solutions, \$500 was paid for Tribal Community Colleges, and \$13,807 was paid for residency positions.

The 2017 North Dakota Legislature passed Senate Bill 2004 that provides for an appropriation of \$360 from the North Dakota Student Loan Trust to the Department of Health for the Dental Loan Repayment Program during the biennium beginning July 1, 2017 and ending June 30, 2019. During the biennium ended June 30, 2019, \$360 was paid to the Department of Health.

**NORTH DAKOTA STUDENT LOAN TRUST**  
**NOTES TO FINANCIAL STATEMENTS**  
**JUNE 30, 2020 and 2019**  
**(In Thousands)**

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The 2017 North Dakota Legislature passed Senate Bill 2014 that provides for an appropriation from the North Dakota Student Loan Trust to the North Dakota Industrial Commission during the biennium beginning July 1, 2017 and ending June 30, 2019. During the biennium ended June 30, 2019, \$87 was paid to the North Dakota Industrial Commission.

The 2017 North Dakota Legislature passed Senate Bill 2144 that provides for an appropriation of \$500 from the North Dakota Student Loan Trust to the Department of Commerce for Tribal workforce grants during the biennium beginning July 1, 2017 and ending June 30, 2019. During the biennium ended June 30, 2019, \$300 was paid to the Department of Commerce.

The 2017 North Dakota Legislature passed Senate Bill 2244 that provides for an appropriation of \$200 from the North Dakota Student Loan Trust to the State Board of Higher Education to create a dual-credit courses pilot program during the biennium beginning July 1, 2017 and ending June 30, 2019. During the biennium ended June 30, 2019, \$197 was paid to the State Board of Higher Education.

**NOTE 8 - RISK MANAGEMENT**

The North Dakota Student Loan Trust is exposed to various risks of loss related to torts and errors and omissions. The North Dakota Student Loan Trust is administered by the North Dakota Industrial Commission and, therefore, is eligible to the same funds/pools established by the State for risk management issues. These include:

The 1995 Legislative Session established the Risk Management Fund (RMF), an internal service fund, to provide a self-insurance vehicle for funding the liability exposures of State Agencies resulting from the elimination of the State's sovereign immunity. The RMF manages the tort liability of the State, its agencies' employees, and the University System. All State agencies participating in the RMF and their fund contribution was determined using a projected cost allocation approach. The statutory liability of the State is limited to a total of \$250,000 per person and \$1,000,000 per occurrence. The State Bonding Fund currently provides the Fund with blanket employee fidelity bond coverage in the amount of \$750,000. The State Bonding Fund does not currently charge any premium for this coverage.

There have been no significant reductions in insurance coverage from the prior year and settled claims resulting from these risks have not exceeded insurance coverage in any of the past three fiscal years.



Supplementary Information  
June 30, 2020 and 2019

# North Dakota Student Loan Trust



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**NORTH DAKOTA STUDENT LOAN TRUST**  
**COMBINING STATEMENT OF NET POSITION**  
**JUNE 30, 2020**  
**(In Thousands)**

	General Bond Resolution Fund	Second General Bond Resolution Fund	Total
<b>ASSETS</b>			
<b>CURRENT ASSETS - UNRESTRICTED</b>			
Due from other state agencies	\$ -	\$ 16	\$ 16
<b>CURRENT ASSETS - RESTRICTED</b>			
Cash and cash equivalents	47	345	392
Investments	1,000	-	1,000
Student loans receivable	-	142	142
Total restricted current assets	1,047	487	1,534
<b>NONCURRENT ASSETS - UNRESTRICTED</b>			
Student loans receivable	-	698	698
Total assets	\$ 1,047	\$ 1,201	\$ 2,248

	General Bond Resolution Fund	Second General Bond Resolution Fund	Total
<b>LIABILITIES AND NET POSITION</b>			
<b>CURRENT LIABILITIES</b>			
Due to other state agencies	\$ 47	\$ -	\$ 47
Accrued fees payable - related party	-	2	2
Total current liabilities	<u>47</u>	<u>2</u>	<u>49</u>
<b>NONCURRENT LIABILITIES</b>			
Bonds payable	<u>1,000</u>	<u>-</u>	<u>1,000</u>
Total liabilities	<u>1,047</u>	<u>2</u>	<u>1,049</u>
<b>NET POSITION</b>			
Restricted for debt service	-	487	487
Unrestricted	<u>-</u>	<u>712</u>	<u>712</u>
Total net position	<u>-</u>	<u>1,199</u>	<u>1,199</u>
Total liabilities and net position	<u>\$ 1,047</u>	<u>\$ 1,201</u>	<u>\$ 2,248</u>

**NORTH DAKOTA STUDENT LOAN TRUST**  
**COMBINING STATEMENT OF NET POSITION**  
**JUNE 30, 2019**  
**(In Thousands)**

	General Bond Resolution Fund	Second General Bond Resolution Fund	Total
<b>ASSETS</b>			
<b>CURRENT ASSETS - UNRESTRICTED</b>			
Due from other state agencies	\$ -	\$ 10	\$ 10
<b>CURRENT ASSETS - RESTRICTED</b>			
Cash and cash equivalents	19	206	225
Investments	1,000	-	1,000
Student loans receivable	-	162	162
Total restricted current assets	1,019	368	1,387
<b>NONCURRENT ASSETS - UNRESTRICTED</b>			
Student loans receivable	-	816	816
Total assets	\$ 1,019	\$ 1,194	\$ 2,213

	General Bond Resolution Fund	Second General Bond Resolution Fund	Total
<b>LIABILITIES AND NET POSITION</b>			
<b>CURRENT LIABILITIES</b>			
Accrued interest payable	\$ 3	\$ -	\$ 3
Accrued fees payable - related party	-	7	7
Appropriation payable	5	9	14
Total current liabilities	<u>8</u>	<u>16</u>	<u>24</u>
<b>NONCURRENT LIABILITIES</b>			
Bonds payable	<u>1,000</u>	<u>-</u>	<u>1,000</u>
Total liabilities	<u>1,008</u>	<u>16</u>	<u>1,024</u>
<b>NET POSITION</b>			
Restricted for debt service	11	368	379
Unrestricted	-	810	810
Total net position	<u>11</u>	<u>1,178</u>	<u>1,189</u>
Total liabilities and net position	<u>\$ 1,019</u>	<u>\$ 1,194</u>	<u>\$ 2,213</u>

**NORTH DAKOTA STUDENT LOAN TRUST**  
**COMBINING STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION**  
**YEAR ENDED JUNE 30, 2020**  
(In Thousands)

	General Bond Resolution Fund	Second General Bond Resolution Fund	Total
<b>OPERATING REVENUES</b>			
Interest on student loans	\$ -	\$ 63	\$ 63
<b>OPERATING EXPENSES</b>			
Interest	23	-	23
Service fees	-	3	3
Administration fees	-	1	1
Bond related expenses	22	-	22
Total operating expenses	45	4	49
<b>OPERATING INCOME /(LOSS)</b>	(45)	59	14
<b>NONOPERATING REVENUE</b>			
Investment income	6	1	7
<b>INCOME (LOSS) BEFORE TRANSFERS</b>	(39)	60	21
<b>TRANSFERS</b>			
State Board of Higher Education	85	-	85
Interfund	39	(39)	-
North Dakota Industrial Commission	(96)	-	(96)
Total transfers	28	(39)	(11)
<b>CHANGE IN NET POSITION</b>	(11)	21	10
<b>TOTAL NET POSITION, BEGINNING OF YEAR</b>	11	1,178	1,189
<b>TOTAL NET POSITION, END OF YEAR</b>	\$ -	\$ 1,199	\$ 1,199

**NORTH DAKOTA STUDENT LOAN TRUST**  
**COMBINING STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET POSITION**  
**YEAR ENDED JUNE 30, 2019**  
(In Thousands)

	General Bond Resolution Fund	Second General Bond Resolution Fund	Total
<b>OPERATING REVENUES</b>			
Interest on student loans	\$ -	\$ 70	\$ 70
<b>OPERATING EXPENSES</b>			
Interest	31	-	31
Service fees	-	9	9
Administration fees	-	1	1
Bond related expenses	28	-	28
Total operating expenses	59	10	69
<b>OPERATING INCOME</b>	(59)	60	1
<b>NONOPERATING REVENUE</b>			
Investment income	4	10	14
<b>INCOME BEFORE TRANSFERS</b>	(55)	70	15
<b>TRANSFERS</b>			
State Board of Higher Education	30	66	96
Department of Commerce	-	200	200
Interfund	(771)	771	-
Total transfers	(741)	1,037	296
<b>CHANGE IN NET POSITION</b>	(796)	1,107	311
<b>TOTAL NET POSITION, BEGINNING OF YEAR</b>	807	71	878
<b>TOTAL NET POSITION, END OF YEAR</b>	\$ 11	\$ 1,178	\$ 1,189



**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***

Governor of North Dakota  
and the Legislative Assembly  
State of North Dakota  
Bismarck, North Dakota

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 *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the North Dakota Student Loan Trust (the Trust), an enterprise fund of the State of North Dakota, as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise the Trust's basic financial statements and have issued our report thereon dated November 12, 2020.

**Internal Control over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the 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 Trust's internal control. Accordingly, we do not express an opinion on the effectiveness of the 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 entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, material weaknesses may exist that have not yet been identified.



**Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the 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 that are required to be reported under *Government Auditing Standards*.

**Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the 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 entity’s internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

A handwritten signature in black ink that reads "Eide Bailly LLP". The signature is written in a cursive, flowing style.

Bismarck, North Dakota  
November 12, 2020



**Independent Auditor's Comments Requested by the  
North Dakota Legislative Audit and Fiscal Review Committee  
Year Ended June 30, 2020**

Governor of North Dakota  
and the Legislative Assembly  
State of North Dakota  
Bismarck, North Dakota

The Legislative Audit and Fiscal Review Committee requires that certain items be addressed by independent certified public accountants performing audits of state agencies. The items and our responses are as follows:

**Audit Report Communications**

1. What type of opinion was issued on the financial statements?

Unmodified

2. Was there compliance with statutes, laws, rules, and regulations under which the agency was created and is functioning?

Yes

3. Was internal control adequate and functioning effectively?

Yes

4. Were there any indications of lack of efficiency in financial operations and management of the agency?

No

5. Has action been taken on findings and recommendations included in prior year audit reports?

There were no prior year findings or recommendations.

6. Was a management letter issued? If so, provide a summary below, including any recommendations and the management response.

No

**Audit Committee Communications:**

1. Identify any significant changes in accounting policies, any management conflicts of interest, any contingent liabilities, or any significant unusual transactions.

None

2. Identify any significant accounting estimates and the process used by management to determine those estimates, and the basis for the auditor's conclusions regarding the reasonableness of these estimates.

None

3. Identify any significant audit adjustments.

None

4. Identify any disagreements with management, whether or not resolved to the auditor's satisfaction, relating to financial accounting, reporting, or auditing matter that could be significant to the financial statements.

None

5. Identify any significant difficulties encountered in performing the audit.

None

6. Identify any major issues discussed with management prior to retention.

None

7. Identify any management consultations with other accountants about auditing and accounting matters.

None

8. Identify any high-risk information technology systems critical to operations based on the auditor's overall assessment of the importance of the system to the agency and its mission or whether any exceptions identified in the six audit report questions addressed above are directly related to the operations of an information technology system.

Based on the audit procedures performed, North Dakota Student Loan Trust's critical information technology system is the Helms system. There were no exceptions identified that were directly related to this application.

This report is intended solely for the information and use of the Governor of North Dakota, Legislative Assembly, North Dakota Industrial Commission, Bank of North Dakota Advisory Board and management of the Trust, and is not intended to be and should not be used by anyone other than these specified parties.

*Eide Sully LLP*

Bismarck, North Dakota  
November 12, 2020



November 12, 2020

Governor of North Dakota  
and the Legislative Assembly  
State of North Dakota  
Bismarck, North Dakota

We have audited the financial statements of North Dakota Student Loan Trust as of and for the year ended June 30, 2020, and have issued our report thereon dated November 12, 2020. Professional standards require that we advise you of the following matters relating to our audit.

**Our Responsibility in Relation to the Financial Statement Audit under Generally Accepted Auditing Standards and *Government Auditing Standards***

As communicated in our letter dated July 15, 2020, our responsibility, as described by professional standards, is to form and express an opinion about whether the financial statements that have been prepared by management with your oversight are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America. Our audit of the financial statements does not relieve you or management of your respective responsibilities.

Our responsibility, as prescribed by professional standards, is to plan and perform our audit to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material misstatement. An audit of financial statements includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control over financial reporting. Accordingly, as part of our audit, we considered the internal control of North Dakota Student Loan Trust solely for the purpose of determining our audit procedures and not to provide any assurance concerning such internal control.

We are also responsible for communicating significant matters related to the audit that are, in our professional judgment, relevant to your responsibilities in overseeing the financial reporting process. However, we are not required to design procedures for the purpose of identifying other matters to communicate to you.

We have provided our comments regarding any significant control deficiencies during our audit in our 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* dated November 12, 2020.

### **Planned Scope and Timing of the Audit**

We conducted our audit consistent with the planned scope and timing we previously communicated to you.

### **Compliance with All Ethics Requirements Regarding Independence**

The engagement team, others in our firm, as appropriate, our firm, and other firms utilized in the engagement, if applicable, have complied with all relevant ethical requirements regarding independence.

### **Qualitative Aspects of the Entity's Significant Accounting Practices**

#### *Significant Accounting Policies*

Management has the responsibility to select and use appropriate accounting policies. A summary of the significant accounting policies adopted by North Dakota Student Loan Trust is included in Note 1 to the financial statements. There have been no initial selection of accounting policies and no changes in significant accounting policies or their application during 2020. No matters have come to our attention that would require us, under professional standards, to inform you about (1) the methods used to account for significant unusual transactions and (2) the effect of significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

#### *Significant Accounting Estimates*

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's current judgments. Those judgments are normally based on knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ markedly from management's current judgments.

There are no significant estimates that affect the North Dakota Student Loan Trust's financial statements.

#### *Financial Statement Disclosures*

Certain financial statement disclosures involve significant judgment and are particularly sensitive because of their significance to financial statement users. The most sensitive disclosures affecting North Dakota Student Loan Trust's financial statements relate to: Note 6 – Interfund and Related Party Transactions.

### **Significant Difficulties Encountered during the Audit**

We encountered no significant difficulties in dealing with management relating to the performance of the audit.

### **Uncorrected and Corrected Misstatements**

For purposes of this communication, professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that we believe are trivial, and communicate them to the appropriate level of management. Further, professional standards require us to also communicate the effect of uncorrected misstatements related to prior periods on the relevant classes of transactions, account balances or disclosures, and the financial statements as a whole and each applicable opinion unit.

There were no corrected or uncorrected misstatements identified as a result of audit procedures.

### **Disagreements with Management**

For purposes of this letter, professional standards define a disagreement with management as a matter, whether or not resolved to our satisfaction, concerning a financial accounting, reporting, or auditing matter, which could be significant to North Dakota Student Loan Trust financial statements or the auditor's report. No such disagreements arose during the course of the audit.

### **Representations Requested from Management**

We have requested certain written representations from management which are included in the management representation letter dated November 12, 2020.

### **Management's Consultations with Other Accountants**

In some cases, management may decide to consult with other accountants about auditing and accounting matters. Management informed us that, and to our knowledge, there were no consultations with other accountants regarding auditing and accounting matters.

### **Other Significant Matters, Findings, or Issues**

In the normal course of our professional association with North Dakota Student Loan Trust, we generally discuss a variety of matters, including the application of accounting principles and auditing standards, operating and regulatory conditions affecting the entity, and operational plans and strategies that may affect the risks of material misstatement. None of the matters discussed resulted in a condition to our retention as North Dakota Student Loan Trust's auditors.

### **Modification of the Auditor's Report**

We have made the following modification to our auditor's report.

As discussed in Note 1, the financial statements of the Trust are intended to present the financial position, the changes in financial position and cash flows of only that portion of the State of North Dakota that is attributable to the transactions of the Trust. They do not purport to, and do not, present fairly the financial position of the State of North Dakota as of June 30, 2020 and 2019, and the changes in its financial position and cash flows for the years then ended in conformity with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

This report is intended solely for the information and use of the Governor of North Dakota, Legislative Assembly, North Dakota Industrial Commission, Bank of North Dakota Advisory Board, and management of North Dakota Student Loan Trust and is not intended to be, and should not be, used by anyone other than these specified parties.

*Eide Bailly LLP*

Bismarck, North Dakota  
November 12, 2020