

**Oklahoma Student
Loan Authority
A Component Unit of the
State of Oklahoma**

Annual Financial Report
June 30, 2022 and 2021

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RSM US LLP

Independent Auditor's Report

Board of Trustees
Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Opinions

We have audited the financial statements of the Oklahoma Student Loan Authority (the Authority), a component unit of the State of Oklahoma, as of and for the year ended June 30, 2022 and 2021, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, as listed on the table of contents.

In our opinion, the accompanying financial statements referred to above present fairly, in all material respects, the financial position of the Authority as of June 30, 2022 and 2021, and the respective changes in financial position and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinions

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 Auditors Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

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 Authority's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with 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 Authority'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 Authority'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 and the schedule of the Authority's proportionate share of the net pension liability-OTRS and schedule of the Authority's contributions-OTRS, as listed in the table of contents, be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Supplementary Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Authority's basic financial statements. The accompanying schedule of expenditures of federal awards, as required by *Title 2 U.S. Code of Federal Regulations Part 200*, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, is presented for purposes of additional analysis and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is 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 17, 2022, on our consideration of the Authority'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 Authority'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 Authority's internal control over financial reporting and compliance.

RSM US LLP

Oklahoma City, Oklahoma
November 17, 2022

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Management's Discussion and Analysis
Years Ended June 30, 2022 and 2021**

The Oklahoma Student Loan Authority (the Authority) is an eligible lender, a loan servicer, and a secondary market in the guaranteed Federal Family Education Loans (FFEL) Program under the Higher Education Act. The Authority services Direct Loans for the U.S. Department of Education as described below. The Authority performs loan servicing functions under the registered trade name "OSLA Student Loan Servicing TM."

The Student Aid and Fiscal Responsibility Act of 2009 (SAFRA), Title II of the Reconciliation Act, became law on March 20, 2010. Beginning July 1, 2010, eligible lenders, including the Authority and members of the OSLA Network of eligible lenders, were no longer allowed to originate FFEL Program student loans. Beginning July 1, 2010, all federal student loans were solely originated by the federal government pursuant to its Direct Loan Program.

In the years prior to July 1, 2010, the Authority originated loans and performed servicing of FFEL Program loans for as many as 45 other eligible lenders as members of the OSLA Network. Upon the elimination of the new loan originations in the FFEL Program, the Authority continued working with members of the OSLA Network to service their loans or liquidate their loans by sales to the United States Department of Education (USDE). In 2016, the Authority purchased the remaining loans owned by the OSLA Network using proceeds from the 2016-1 financing.

SAFRA required the Secretary of the Department of Education to contract with eligible and qualified Not-For-Profit (NFP) student loan servicers to service loans owned by the USDE. The Authority satisfied all USDE requirements for a prime loan servicing contract and was awarded an NFP contract in July 2012. USDE has implemented various modifications to the NFP servicer program and, as of June 30, 2022, OSLA is servicing approximately 1,184,000 borrowers. USDE's modifications include extensions of OSLA's prime loan servicing contract through December 31, 2023.

This section of the Authority's annual financial report presents a discussion and analysis of the Authority's financial performance for the fiscal years ended June 30, 2022 and 2021. Please read it in conjunction with the Authority's financial statements and the notes to the financial statements, which follow this section.

Financial Highlights

	2022	2021	2020
Total assets	\$ 174,660,645	\$ 198,284,456	\$ 222,770,263
Student loans receivable, net	141,016,464	169,714,908	197,049,832
Total operating revenue	25,855,305	20,587,437	21,248,400
Net interest margin (interest income less interest expense)	2,429,789	2,640,352	3,218,952
Total operating expenses	22,457,341	18,293,655	21,210,581
Total nonoperating revenue	335,288	479,548	657,007
Net position	69,393,978	65,660,726	62,887,396

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Management's Discussion and Analysis
Years Ended June 30, 2022 and 2021**

Overview of the Financial Statements

Please refer to the notes to financial statements, summary of accounting policies, for a description of the Authority's basis of accounting and accounting policies.

Incentive programs affecting operating revenues: The Authority generates its operating revenues from borrower interest, subsidized interest and special allowance from the USDE, and loan servicing fees from our student loan portfolio and through our loan servicing contract with USDE. Certain policies of the Authority affect the generation of operating revenues.

The Authority offered certain incentive programs to our borrowers which continue to have an effect on our FFEL portfolio:

The following three incentives were offered for loans with first disbursement dates prior to July 1, 2008. The Authority eliminated or reduced this interest rate reduction incentive program for loans with first disbursement dates on or after July 1, 2008.

TOP Interest Rate Reduction: A portion of Stafford Loan and PLUS borrowers earned a 1.5% interest rate reduction by making their first twelve payments on time. The reduced interest rate applies for the life of the loan.

EZ PAY Interest Rate Reduction: Borrowers earned an interest rate reduction by using the Authority's electronic debit tool for making their monthly payments. The reduced interest rate applies as long as the borrower uses OSLA's electronic debit, EZ PAY, for making monthly payments. The incentive was increased from 0.33% to 1.0% effective June 20, 2007. The incentive was decreased from 1.0% to 0.25% for loans with first disbursement dates on or after July 1, 2008, as noted above. Subsequently, the incentive was eliminated for loans with first disbursement dates on or after April 1, 2011.

TOP Principal Reduction: A portion of Stafford Loan and PLUS borrowers earned a 1.0% reduction in the principal amount of their loans by making their first three payments on time.

The remaining previously offered incentive described below was discontinued on the date noted.

Consolidation Loan Principal Reduction: Consolidation loan borrowers earned a 1.0% reduction in the principal amount of their loan by making their first six payments on time. The Authority discontinued our consolidation loan program effective July 1, 2008.

The TOP and EZ PAY Interest Rate Reduction programs result in a reduction, and will result in a future reduction, in operating revenues received and in the average yield for the total student loan portfolio.

The Authority expenses the cost associated with the TOP and Consolidation Loan Principal Reduction programs in the period the incentive was earned as a reduction to loan interest income from borrowers.

Oklahoma Student Loan Authority
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Management's Discussion and Analysis
Years Ended June 30, 2022 and 2021

Financial Analysis of the Authority

Components of the Authority's statements of net position are as follows as of June 30:

	2022	2021	2020
Assets and deferred outflows:			
Current assets	\$ 52,022,239	\$ 50,425,543	\$ 58,656,145
Capital assets	1,717,262	347,684	406,448
Other noncurrent assets	120,921,144	147,511,229	163,707,670
Deferred outflows	3,958,261	4,250,609	1,559,052
Total assets and deferred outflows	<u>\$ 178,618,906</u>	<u>\$ 202,535,065</u>	<u>\$ 224,329,315</u>
Liabilities and deferred inflows:			
Current liabilities	\$ 2,247,758	\$ 1,800,823	\$ 1,829,340
Noncurrent liabilities	103,472,493	134,653,284	158,993,767
Deferred inflows	3,504,677	420,232	618,812
Total liabilities and deferred inflows	<u>109,224,928</u>	<u>136,874,339</u>	<u>161,441,919</u>
Net position:			
Invested in capital assets	1,717,262	347,684	406,448
Restricted	14,126,581	49,439,165	48,515,656
Unrestricted	53,550,135	15,873,877	13,965,292
Total net position	<u>69,393,978</u>	<u>65,660,726</u>	<u>62,887,396</u>
Total liabilities, deferred inflows and net position	<u>\$ 178,618,906</u>	<u>\$ 202,535,065</u>	<u>\$ 224,329,315</u>

Student loans receivable, net decreased by approximately \$28,698,000 and \$27,335,000 to approximately \$141,016,000 and \$169,715,000 at June 30, 2022 and 2021, respectively, due primarily to principal payments received from borrowers, claim payments from guarantors and loan consolidations.

Cash and investments increased by approximately \$2,299,000 to approximately \$22,842,000 at June 30, 2022. This was primarily the result of an increase in loan servicing fees income at June 30, 2022, compared to June 30, 2021, and increased by approximately \$2,411,000 to approximately \$20,543,000 at June 30, 2021, due primarily to lower operating expenses due to the Coronavirus Aid, Relief and Economic Security (CARES) Act payment pause at June 30, 2021, such as lower staffing levels and communication cost with borrowers.

Notes and bonds payable decreased by approximately \$25,928,000 and \$28,537,000 to approximately \$97,387,000 and \$123,315,000 as of June 30, 2022 and 2021, respectively. During fiscal year 2022, the Authority made all required principal payments and also refunded all of the outstanding bonds and notes payable through the issuance the 2021 Note Payable. In 2021, the decrease was due primarily to principal payments on outstanding notes and bonds payable.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Management's Discussion and Analysis
Years Ended June 30, 2022 and 2021

Financial Analysis of the Authority (Continued)

Pension liability results from the Authority's participation in the Teacher's Retirement System of Oklahoma. The net pension liability is \$5.7 million, \$10.9 million, and \$6.7 million for years ended June 30, 2022, 2021, and 2019, respectively. We have made required contributions since the Authority's inception. Actuarial calculations and assumptions drive the recognized pension liability and related expense recognition based on the Authority's proportion of the net pension liability of the plan. See Note 6—Retirement Plan in the notes to audited financial statements.

Components of the statement of revenues, expenses, and changes in net position are as follows for the fiscal years ended June 30:

	2022	2021	2020
Revenues:			
Operating revenues	\$ 25,855,305	\$ 20,587,437	\$ 21,248,400
Nonoperating revenues	335,288	479,548	657,007
Total revenues	<u>26,190,593</u>	<u>21,066,985</u>	<u>21,905,407</u>
Expenses:			
Operating expenses	22,457,341	18,293,655	21,210,581
Increase/(decrease) in net position	<u>\$ 3,733,252</u>	<u>\$ 2,773,330</u>	<u>\$ 694,826</u>

Additional analysis of the statement of revenues, expenses, and changes in net position are as follows for the fiscal years ended June 30:

	2022	2021	2020
Loan interest income, net of consolidation rebate fees	\$ 3,876,104	\$ 4,130,122	\$ 7,389,006
Investment interest income	24,854	97,983	307,466
Total interest income	<u>3,900,958</u>	<u>4,228,105</u>	<u>7,696,472</u>
Less interest expense	1,471,169	1,587,753	4,477,520
Net interest margin	<u>\$ 2,429,789</u>	<u>\$ 2,640,352</u>	<u>\$ 3,218,952</u>

Loan interest income for the year ended June 30, 2022 decreased by \$254,000 due to decreases in student loans receivable from gradual payoffs of FFELP loans and a similar decrease in net payments to USDE. Loan interest income for the year ended June 30, 2021 decreased by \$3,259,000 due to decreases in student loans receivable from gradual payoffs of FFELP loans and a significant increase in net payments to USDE. Loan interest income is primarily affected by loans outstanding and the variable interest rates on student loans, which are reset annually on July 1st. The variable rates ranged from: 1.72% to 3.34% for the year ended June 30, 2022, 1.83% to 3.42% for the year ended June 30, 2021, and 4.06% to 5.61% for the year ended June 30, 2020. The fixed rates for loans first disbursed on or after July 1, 2006, ranged from 5.6% to 8.5%. See Note 4, Loans and Allowance for Loan Losses, for explanation of the quarterly lenders' yield and its relationship to the loans' stated variable or fixed interest rates. The lender's yield is based on the 1-Month LIBOR index for purposes of special allowance calculations.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Management's Discussion and Analysis
Years Ended June 30, 2022 and 2021**

Financial Analysis of the Authority (Continued)

The Authority services loans for USDE and earns a monthly fee based on the number of borrowers serviced and the loan status for the borrowers. Additional loans are allocated to all servicers with USDE servicing contracts based on performance metrics measured during the year. Loan servicing fees earned pursuant to the USDE contracts has increased in each of the three years ending June 30, 2022 due to an increase in the number of borrowers served.

Interest expense: The Authority funded the origination or acquisition of student loans by periodically issuing bonds and notes. The approximate \$25,928,000 decrease in bonds and notes outstanding and the weighted average cost of funds of 1.15% during the year ended June 30, 2022 compared to the weighted average cost of funds of 0.99% at June 30, 2021, resulted in a decrease in total interest expense for the year ended June 30, 2022. The approximate \$28,537,000 decrease in bonds and notes outstanding during the year ended June 30, 2021 was accompanied by a decrease in the weighted average cost of funds to 0.99% as of June 30, 2021, compared to a 1.78% cost of funds at June 30, 2020, and led to a decrease in interest expense for the year ended June 30, 2021. The approximate \$35,159,000 decrease in bonds and notes outstanding during the year ended June 30, 2020 was accompanied by a decrease in the weighted average cost of funds to 1.78% as of June 30, 2020, compared to a 3.40% cost of funds at June 30, 2019, and led to a decrease in interest expense for the year ended June 30, 2020.

Net interest margin for the year ended June 30, 2022, of approximately \$2,543,000, represents a decrease of approximately \$97,000 from the prior year, which is the result of a decrease in loan interest income partially offset by a decrease in interest expense. Net interest margin for the year ended June 30, 2021, of approximately \$2,640,000, represents a decrease of approximately \$579,000 from the prior year, which is the result of a significant decrease in loan interest income partially offset by a decrease in interest expense. Net interest margin for the year ended June 30, 2020, of approximately \$3,219,000 resulted from an increase in interest expense coupled with a decrease in interest income and represents a decrease of approximately \$897,000 from the prior year.

Other operating revenues is comprised primarily of loan servicing fees and increased by approximately \$5,522,000 and \$2,598,000 for the years ended June 30, 2022 and June 30, 2021, respectively, due to increases in the number of borrowers serviced under the Authority's loan servicing agreement with the Department of Education, offset in part by lower fees earned from its FFEL portfolio due to decreases in the number of borrowers serviced in both years.

Operating expenses (excluding interest expense) for the year ended June 30, 2022, increased to approximately \$21,100,000 due to an increase in loan servicing fees and other administrative costs, including higher staffing levels due to further increases in Direct Loans service. Operating expenses (excluding interest expense) for the year ended June 30, 2021 decreased slightly to approximately \$16,706,000 due to an increase in loan servicing fees offset by lower administrative costs including lower staffing levels due to the CARES Act payment pause. Operating expenses (excluding interest expense) for the year ended June 30, 2020, increased by 30% to approximately \$16,733,000 due to an increase in loan servicing fees and other administrative costs including higher staffing levels due to further increases in Direct Loans serviced. The 2020 increase is larger due to the effect of the recovery of allowance for loan losses in 2019. We believe our current staffing and related support functions are at the proper levels to achieve highly rated service levels to both our Direct Loan and FFELP borrowers. The Authority prepares an annual operating budget that is used as a management tool for monitoring operating expenses which did not include significant variances for any of the three years ended June 30, 2022.

**Oklahoma Student Loan Authority
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**Management’s Discussion and Analysis
Years Ended June 30, 2022 and 2021**

Financial Analysis of the Authority (Continued)

Nonoperating revenues (excluding investment interest income) typically consist of on-behalf pension contributions which decreased by approximately \$72,000 to approximately \$310,000 for the year ended June 30, 2022 and increased by approximately \$32,000 to approximately \$382,000 for the year ended June 30, 2021, reflecting comparable activity for on-behalf pension costs during those periods. See further discussion of on-behalf pension contributions in Note 6 in the notes to financial statements.

Net position increased by approximately \$3,733,000 and \$2,773,000 at June 30, 2022 and 2021, respectively, due to the changes in revenues and expenses described above.

Debt Administration

The Authority funded student loan notes receivable by issuing tax-exempt and taxable bonds and notes. The bonds and notes were approved by the State of Oklahoma bond oversight process prior to issuance. Tax-exempt bonds or notes also received an allocation of the State of Oklahoma private activity volume ceiling or “cap.” In addition, the issues must comply with federal statutes and with the rules and regulations of the United States Treasury Department and the United States Securities and Exchange Commission.

Detailed information on the Authority’s debt is presented in Note 5 to the audited financial statements.

During fiscal year 2022, the Authority issued the 2021 Note Payable, for which the proceeds were used to refund all notes and bonds payable at the time of issuance. Therefore, extinguishing any publicly held debt as of June 30, 2022. The Authority had \$97,190,000 and \$118,729,000 of publicly held debt as of June 30, 2021 and 2020, respectively, and had long-term credit ratings assigned by Standard and Poor’s (S&P) and Fitch at June 30, 2022, based on the type of security which is reflected in the table below.

Credit Ratings	2022 Principal Amount	2021 Principal Amount	2020 Principal Amount	Type of Security
AAA S&P/ AAA Fitch	\$ -	\$ 97,190,000	\$ 118,729,000	Senior Lien or Insured

In July 2021, Fitch affirmed its AAA(sf) ratings on Series 2010A-2A, 2010A-2B, 2011-1 and 2013-1, citing cash flow model results that were in line with current ratings.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Management's Discussion and Analysis
Years Ended June 30, 2022 and 2021**

Economic Outlook

As described above, the Authority earns loan servicing fees from its contract with USDE based on the number of Direct Loans serviced. The Authority received allocations of additional Direct Loans in fiscal year 2022 and received notice of its allocation for the first half of fiscal year 2023. The Authority expects to continue to receive periodic allocations of loans from its contract with the Department of Education which will continue to increase loan servicing fees earned by the Authority to offset future expected decreases in interest income from borrowers related to the gradual payoff of FFEL Program loans owned by the Authority.

FSA introduced the Unified Servicing and Data Solution (USDS) in May 2022 as a replacement solution for how loan servicers will provide servicing capabilities for FSA's student loan recipients. USDS contracts will replace the existing Title IV Additional Servicers (TIVAS) and NFP contracts that currently expire December 31, 2023. OSLA submitted a proposal to provide services under the USDS contracts. FSA preliminarily indicated they would award USDS contracts to successful offerors in the winter of 2023. The effect of the student loan debt relief program on the timing of contract awards is not known.

President Biden announced a student loan debt relief program in August 2022 designed to discharge up to \$10,000 of student loan debt for eligible borrowers, and up to \$20,000 for eligible borrowers who received Pell Grants. Direct Loans serviced by OSLA are part of this debt relief program. FFEL loans owned by OSLA are currently not covered by the program. Eligible borrowers with qualifying loan balances up to \$10,000 (\$20,000 for Pell Grant recipients) will be fully discharged and no longer serviced by OSLA, resulting in decreased loan servicing fees. Several legal challenges to the debt relief program have been filed, and the outcome of those challenges has not been determined. The number of borrowers whose balances will be fully discharged if the program moves forward as currently structured is not yet known, but the impact on loan servicing fees is expected to be significant.

The interest rate basis for outstanding notes payable is indexed to monthly LIBOR and resulted in significantly reduced weighted average cost of funds in fiscal year 2022. Rates have increased in 2022 with the rate hikes announced by the Federal Reserve. The rate increases are projected to continue into fiscal 2023 and will result in higher cost of funds and slower pay down of bonds and notes due to a higher portion of collections on student loans required for interest. Higher rates also affect student loans with variable rates that are also LIBOR indexed, resulting in increased interest income from borrowers, offset by the effects of the gradual payoff of FFEL Program loans owned by the Authority.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Statements of Net Position
June 30, 2022 and 2021

	2022	2021
Assets		
Current assets:		
Cash	\$ 210	\$ 210
Restricted cash	87,249	79,225
Investments	19,832,184	14,261,282
Loans, net of allowance for loan losses	24,342,110	28,845,631
Interest and other receivables	7,760,486	7,239,195
Total current assets	52,022,239	50,425,543
Noncurrent assets:		
Restricted investments	2,922,393	6,202,147
Loans, net of allowance for loan losses	116,674,354	140,869,277
Capital assets, net of accumulated depreciation	1,717,262	347,684
Other noncurrent assets	1,324,397	439,805
Total noncurrent assets	122,638,406	147,858,913
Total assets	174,660,645	198,284,456
Deferred outflows of resources:		
Deferred pension plan outflows	2,580,015	4,250,609
Deferred loss on debt refunding outflows	1,378,246	-
Total deferred outflows of resources	3,958,261	4,250,609
Liabilities, Deferred Inflows of Resources and Net Position		
Current liabilities:		
Accounts payable and other accrued expenses	1,918,680	1,091,848
Interest payable to U.S. Department of Education	292,184	632,640
Accrued interest payable	36,894	76,335
Total current liabilities	2,247,758	1,800,823
Noncurrent liabilities:		
Notes payable	97,386,926	26,573,820
Bonds payable, net	-	96,741,461
Net pension liability	5,727,131	10,952,567
Other accrued expenses	358,436	385,436
Total noncurrent liabilities	103,472,493	134,653,284
Total liabilities	105,720,251	136,454,107
Deferred inflows of resources:		
Deferred pension plan inflows	3,504,677	420,232
Net position:		
Investment in capital assets	1,717,262	347,684
Restricted	14,126,581	49,439,165
Unrestricted	53,550,135	15,873,877
Total net position	\$ 69,393,978	\$ 65,660,726

See notes to financial statements.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Statements of Revenues, Expenses, and Changes in Net Position
Years Ended June 30, 2022 and 2021

	2022	2021
Operating revenues:		
Loan interest income:		
From borrowers	\$ 7,000,300	\$ 8,078,575
Net to U.S. Department of Education	(3,124,196)	(3,948,453)
Loan servicing fees	21,979,201	16,457,315
Total operating revenue	25,855,305	20,587,437
Operating expenses:		
Interest	1,471,169	1,587,753
General administration	11,519,025	11,641,292
External loan servicing fees	8,351,881	4,243,056
Professional fees	1,115,266	821,554
Total operating expenses	22,457,341	18,293,655
Operating income	3,397,964	2,293,782
Nonoperating revenues:		
OTRS on-behalf contributions	310,434	381,565
Investment interest income	24,854	97,983
Net nonoperating income	335,288	479,548
Increase in net position	3,733,252	2,773,330
Net position, beginning of year	65,660,726	62,887,396
Net position at end of year	\$ 69,393,978	\$ 65,660,726

See notes to financial statements.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Statements of Cash Flows
Years Ended June 30, 2022 and 2021

	2022	2021
Cash flows from operating activities:		
Receipts of interest income from borrowers	\$ 7,379,492	\$ 8,145,081
Payments of interest to USDE	(3,464,652)	(3,988,745)
Receipts of loan servicing fees	21,080,578	15,839,872
Receipts of loan principal payments	32,289,077	31,328,849
Acquisition of student loans receivable	(3,587,325)	(3,987,932)
Payments to employees and suppliers	(21,212,786)	(14,653,205)
Net cash provided by operating activities	32,484,384	32,683,920
Cash flows from noncapital financing activities:		
Debt issuances	117,220,000	-
Payments on interest on notes and bonds payable	(912,567)	(1,522,251)
Payments on issuance cost	(410,620)	
Payments on bonds and notes payable	(27,931,139)	(28,634,206)
Payment to escrow for refunding of bonds and notes	(116,681,629)	-
Net cash used in noncapital financing activities	(28,715,955)	(30,156,457)
Cash flows from investing activities:		
Proceeds from sales of investments	43,137,152	56,469,534
Receipts of interest on investments	22,994	97,956
Purchases of investments	(45,268,914)	(58,907,097)
Net cash used in investing activities	(2,108,768)	(2,339,607)
Cash flows from capital and related financing activities:		
Purchases of capital assets	(1,651,637)	(214,139)
Net increase (decrease) in cash	8,024	(26,283)
Cash at beginning of year	79,435	105,718
Cash at end of year	\$ 87,459	\$ 79,435

(Continued)

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Statements of Cash Flows (Continued)
Years Ended June 30, 2022 and 2021

	2022	2021
Reconciliation of operating income to net cash provided by operating activities:		
Operating income	\$ 3,397,964	\$ 2,293,782
Adjustments to reconcile operating income to net cash provided by operating activities:		
Interest paid on bonds and notes payable	912,567	1,522,251
Issuance cost paid on debt refunding	410,620	-
Amortization of discounts on bonds payable	-	97,600
Amortization of deferred outflows bonds	113,491	-
Depreciation on capital assets	282,059	272,903
Amortization of premiums on loan acquisition costs	61,829	19,776
OTRS on-behalf contributions	310,434	381,565
(Increase) decrease in assets and deferred outflows of resources:		
Student loans receivable, net	28,702,631	27,321,141
Interest and other receivables	(859,887)	(550,937)
Other assets	(823,862)	48,367
Deferred pension plan outflows	1,670,594	(2,691,557)
Increase (decrease) in liabilities and deferred inflows of resources:		
Accounts payable and other accrued expenses	826,832	17,876
Accrued interest payable	(39,441)	(32,098)
Interest payable to U.S. Department of Education	(340,456)	(40,292)
Net pension liability	(5,225,436)	4,222,123
Deferred pension plan inflows	3,084,445	(198,580)
Net cash provided by operating activities	\$ 32,484,384	\$ 32,683,920

See notes to financial statements.

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 1. Reporting Entity and Nature of Program

The Oklahoma Student Loan Authority (the Authority) was created as an express trust under applicable Oklahoma Statutes and a Trust Indenture dated August 2, 1972, with the State of Oklahoma (the State) accepting the beneficial interest therein. The Authority is a component unit of the State and is included in the annual comprehensive financial report of the State. The Authority's financial statements present only the Authority and do not purport to, and do not, present fairly the financial position of the State of Oklahoma, as of June 30, 2022 and 2021, the changes in its financial position, or its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

The purpose of the Authority is (1) to service borrowers with loans offered under the Federal Family Education Loan (FFEL) Program and (2) to service federal loans as part of its Not-For-Profit (NFP) contract with the Department of Education.

The student loans held by the Authority under the Federal Higher Education Act of 1965 (Higher Education Act), as amended, include Federal Stafford Loans (Stafford), Unsubsidized Stafford Loans for Middle Income Borrowers (Unsubsidized Stafford), Federal Supplemental Loans for Students (SLS), Federal Parent Loans for Undergraduate Students (PLUS), and Federal Consolidation Loans (Consolidation).

The FFEL Program loans are guaranteed by the Oklahoma State Regents for Higher Education Guaranteed Student Loan Program (State Guarantee Agency), which is reinsured by the United States Department of Education (USDE), or guaranteed by other guarantors approved by the USDE (Guarantee Agencies). As of June 30, 2022 and 2021, the majority of loans are guaranteed at 97% for loans first disbursed on or after July 1, 2006. The Authority must complete certain due diligence and claim filing requirements for delinquent loans in order to maintain the guarantee.

The Authority also holds private loans through the Supplemental Higher Education Loan Financing (SHELF™) Program. These loans are not guaranteed under the Higher Education Act. The Authority discontinued originations of SHELF loans effective July 1, 2008.

In July 2012, the Authority was awarded a NFP Servicer loan servicing contract by the Department of Education to service loans owned by the Department of Education in its Direct Loan Program under the Higher Education Act. The Authority earns a monthly servicing fee pursuant to the NFP Servicer loan servicing contract based on the number of borrower accounts. As of June 30, 2022, the Authority was servicing approximately 1,184,000 borrowers with an aggregate principal balance of approximately \$22,785,448,000 compared to approximately 907,000 borrowers with an aggregate principal balance of approximately \$17,658,455,000 at June 30, 2021. The Department issued contract modifications to the Authority to exercise their Optional Ordering Period. The period of performance for the Authority's contract has been extended through December 31, 2023.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

Notes to Financial Statements

Note 2. Summary of Significant Accounting Policies

The financial statements of the Authority included herein reflect the combined assets, deferred outflows of resources, liabilities, deferred inflows of resources, net position, and changes therein for the Authority.

The Governmental Accounting Standards Board (GASB) is the recognized standard-setting body for accounting principles generally accepted applicable to governmental proprietary activities in the United States of America. The Authority applies all applicable GASB pronouncements.

Basis of accounting: The Authority's financial statements are prepared using the economic resources measurement focus and use the accrual basis of accounting, similar to private business enterprises. Under the accrual basis of accounting, revenues are recognized when earned, and expenses are recognized when incurred.

Use of estimates: The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts in the financial statements and accompanying notes. Actual results could differ from those estimates.

Cash: Cash consists primarily of demand deposit accounts at financial institutions. The Authority also utilizes bank deposit accounts which periodically sweep cash into uninsured short-term investment securities.

Investments: Investments consist of U.S. government securities-based mutual funds, certificates of deposit, U.S. Treasuries, including Bills and Notes. Applicable Oklahoma Statutes authorize certain types of investments the Authority can utilize.

Non-negotiable certificates of deposit and U.S. Treasuries, including bills and notes, and government securities with original maturities of less than one year are stated at cost. U.S. Treasuries and government securities with a maturity of greater than one year are stated at fair value with changes in fair value included in the statements of revenues, expenses, and changes in net position. Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The U.S. government securities-based mutual funds are stated at the net asset value (NAV) of the fund.

Loans and allowance for loan losses: Loans are stated at cost, net of an allowance for loan losses. The Authority includes in the cost of a loan any premium paid on student loans purchased. Premiums are amortized over the estimated life of the loan as an adjustment to interest income.

All of the FFEL Program loans made or acquired by the Authority are guaranteed, and Authority staff completes required due diligence and claim filing to maintain the guarantee, as described in Note 1. There is still risk to the Authority if the loans should lose their guarantee status. The Authority has established cure and recovery procedures to be applied to loans that have lost their guarantee status. If the cure and recovery procedures are not successful within a maximum of three years, the loan will be written off as uncollectible.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

Notes to Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

The allowance for loan losses was established by the Authority's management to provide for this type of loss, as well as losses on non-guaranteed SHELF™ loans. Student loans are written off when they are deemed uncollectible and charged against the allowance upon such determination. Any subsequent collection or recovery on an account written off as uncollectible is credited to the allowance.

Capital assets: The Authority capitalizes expenditures for equipment, software, system development, and leasehold improvements. Depreciation and amortization are calculated primarily using a straight-line basis over three to ten years. Accumulated depreciation and amortization on capital assets at June 30, 2022 and 2021 was approximately \$6,724,000 and \$6,445,000, respectively. Depreciation expense for the years ended June 30, 2022 and June 30, 2021 was approximately \$282,000 and \$273,000, respectively. Maintenance costs for equipment and other assets are expensed as incurred.

Net position: The Authority's net position is classified as follows:

Investment in capital assets: This represents the Authority's total investment in capital assets.

Restricted net position: Net position where the use is restricted by a third party or enabling legislation. The Authority's restricted net position is restricted by the debt covenants for the purpose of providing collateral for the outstanding debt obligations and paying debt interest and principal payments that are due (see Note 5).

Unrestricted net position: Net position that does not meet the definition of invested in capital assets or restricted is classified as unrestricted.

Operating revenues and expenses: Balances classified as operating revenues and expenses are those which comprise the Authority's principal operations. Since the Authority's operations are similar to those of a finance company, all revenues and expenses related to servicing the loans are considered operating with the exception of investment interest income and OTRS on-behalf contributions.

Servicing fees earned from the Authority's NFP servicing contract with USDE are recorded in the month such services are provided.

Interest income: Interest is earned from the borrowers on the various types of student loans, from the USDE, and from investments. The USDE makes two types of interest payments to the Authority. One is for the interest on Subsidized Stafford and Consolidation loans when the borrower is not currently required to make principal and interest payments under the terms of the loan. Such interest income from the USDE for the years ended June 30, 2022 and 2021 was approximately \$233,000 and \$331,000, respectively. The other type of interest payment that may be received from the USDE is a Special Allowance Payment (SAP). The rates for Special Allowance Payments are based on formulas that differ according to the type of loan, the date the loan was first disbursed, the interest rate, and the type of funds used to finance such loans (tax-exempt or taxable). Most loan rates in the Authority's portfolio are based upon the 1-month LIBOR index, and also include the average rate established in the auctions of 91-day U.S. Treasury bills during such quarter or the quotes of three-month commercial paper (financial index) in effect for each of the days in such quarter. In the event that the quarterly Special Allowance Rates are less than the stated interest rate for the loans with first disbursement on or after April 1, 2006, lenders are required to rebate to the USDE this excess interest over the quarterly Special Allowance rate. This rebate typically results in negative Special Allowance income in which case the Authority pays the USDE. Net Special Allowance Payments to the USDE for the years ended June 30, 2022 and 2021 was approximately \$2,262,000 and \$2,997,000, respectively.

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

Additionally, the Authority pays a consolidation rebate fee to the USDE on a monthly basis. The consolidation rebate fee is based on the outstanding principal and unpaid accrued interest on consolidation loans at month end. Consolidation rebate fees paid to the USDE for the years ended June 30, 2022 and 2021 was approximately \$1,095,000 and \$1,282,000, respectively. Such fees are reported as a reduction to loan interest income from USDE.

Deferred inflows of resources: Deferred inflows of resources are the acquisition of net position by the Authority that are applicable to a future period. At June 30, 2022 and 2021, the Authority had deferred inflows related to pension items of approximately \$3,504,000 and \$420,000, respectively. See Note 6 for additional discussion regarding deferred inflows of resources.

Deferred outflows of resources: Deferred outflows are the consumption of net position by the Authority that are applicable to a future period. At June 30, 2022 and 2021, the Authority had deferred outflows of resources related to pension items of approximately \$2,580,000 and \$4,251,000, respectively. See Note 6 for additional discussion regarding pension related deferred outflows of resources. In addition, during fiscal year 2022, the Authority issued a new note payable, for which the proceeds were used to refund all existing debt. The results of the refunding transaction led to recording a deferred loss on refunding of approximately \$1,484,000 and amortizing approximately \$106,000 of that as of June 30, 2022. There were no unamortized deferred losses on refunding transactions reported as of June 30, 2021.

Arbitrage rebate: The proceeds from the Authority's tax-exempt debt issuances are subject to arbitrage rebate laws under the Internal Revenue Code. This arbitrage rebate limits the earnings on investment of tax-exempt proceeds in non-purpose investments. The Authority calculates and makes provisions for any estimated cumulative rebatable arbitrage that must be remitted to the Internal Revenue Service (IRS) for the excess earnings on non-purpose investments. There was no arbitrage liability due to the IRS at June 30, 2022 or June 30, 2021.

Income taxes: As a State beneficiary trust, the income of the Authority earned in the exercise of its essential function is exempt from state and federal income taxes.

New accounting pronouncements adopted in fiscal year 2022: The Authority adopted new accounting pronouncements during the year ended June 30, 2022 as follows:

- GASB Statement No. 87, *Leases*, issued June 2017, establishes a single approach to accounting for and reporting leases by state and local governments. Under this statement, a government entity that is a lessee must recognize (1) a lease liability and (2) an intangible asset representing the lessee's right to use the leased asset. In addition, the Authority must report the (1) amortization expense for using the lease asset over the shorter of the term of the lease or the useful life of the underlying asset, (2) interest expense on the lease liability and (3) note disclosures about the lease. The statement provides exceptions from the single-approach for short-term leases, financial purchases, leases of assets that are investments, and certain regulated leases. This statement also addresses accounting for lease terminations and modifications, sale-leaseback transactions, non-lease components embedded in lease contracts (such as service agreements), and leases with related parties. The requirements of this statement are effective for reporting periods beginning after June 15, 2021. The Authority noted the requirements were not material to its financial statements.

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 2. Summary of Significant Accounting Policies (Continued)

- GASB Statement No. 93, *Replacement of Interbank Offered Rates*, issued March 2020, which is the GASB's response to the pending elimination of the London Interbank Offered Rate (LIBOR), which includes details on dealing with the related extension of the use of LIBOR which has not yet been eliminated. The Authority amended various debt and loan agreements to properly reflect updates to future interest calculations relating to the pending elimination of LIBOR indexed rates.

New accounting pronouncements issued not yet adopted: The GASB has issued new accounting pronouncements which will be effective to the Authority in fiscal years ended after June 30, 2022. A description of the new accounting pronouncement is provided below:

GASB Statement No. 96, *Subscription-Based Information Technology Arrangements (SBITAs)*, issued May 2020, which defines a SBITA; establishes that a SBITA results in a right-to-use subscription asset (an intangible asset) and a corresponding subscription liability; provides the capitalization criteria for outlays other than subscription payments, including implementation costs of a SBITA; and requires note disclosures regarding a SBITA. To the extent relevant, this statement is based on the standards established in GASB Statement No. 87. The requirements of this statement are effective for reporting periods beginning after June 15, 2022. The Authority is currently evaluating the impact of the adoption of this statement.

In June 2022, the GASB issued Statement No. 101, *Compensated Absences*. This Statement clarifies the recognition and measurement guidance for compensated absences. This Statement requires that liabilities for compensated absences be recognized for (1) leave that has not been used and (2) leave that has been used but not yet paid in cash or settled through noncash means. The requirements of this statement are effective for financial statements for reporting periods beginning after December 5, 2023. The Authority is evaluating the impact that adoption of this Statement will have on its financial position, results of operations and cash flows.

Note 3. Investments and Fair Value Measurements

The Authority's investments consist primarily of U.S. government securities-based money market mutual funds in accordance with the Authority's investment policy. Unrestricted investments may also include U.S. bank issued certificates of deposit, U.S. Treasury bills, and municipal bonds. Generally, the policy requires investments to be in U.S. government obligations or obligations explicitly guaranteed by the U.S. government to reduce the Authority's related credit risk, custodial credit risk, and interest rate risk.

Credit risk is the risk that an issuer or guarantor of a security may default on its payment obligations. The U.S. government securities-based money market mutual funds, at June 30, 2022 and 2021 were rated AAA by the Standards & Poor's Corporation, and Aaa by Moody's Investors Service. Certificates of deposit at June 30, 2022 and June 30, 2021 were rated Three-Star or higher by Bauer Financial or A1/A/A or higher by Moody's/S&P/Fitch.

Custodial credit risk for deposits is the risk that in the event of a bank failure, the government's deposits may not be returned to it. The Authority does not have a formal policy for custodial credit risk. Deposits are exposed to custodial credit risk if they are uninsured and uncollateralized. From time to time, account balances may exceed limits insured by the Federal Deposit Insurance Corporation. As of June 30, 2022, the bank balance of the Authority's deposits in financial institutions was approximately \$761,000 of which approximately \$511,000 was uninsured and uncollateralized. However, as of June 30, 2021, the bank balance of the Authority's deposits in financial institutions was approximately \$187,000 and was either fully insured or collateralized.

**Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 3. Investments and Fair Value Measurements (Continued)

Custodial credit risk for investments is the risk that, in the event of the failure of the counterparty, the Authority will not be able to recover the value of its investments or collateral securities that are in possession of an outside party. Investments that are evidenced by securities are exposed to custodial credit risk if they are uninsured, not registered in the name of the Authority, or are held by a counterparty or the counterparty's trust department but not in the name of the Authority. The Authority's position in U.S. government securities-based mutual funds is not subject to custodial credit risk because these open-ended mutual funds are not evidenced by securities. The Authority's U.S. Treasury bills are held by its agent in the Authority's name. At June 30, 2022 and June 30, 2021, all of the Authority's negotiable certificates of deposit were fully insured.

Concentration of credit risk is the risk of loss attributed to the magnitude of the Authority's investments in a single issuer. It is generally considered that an increased risk of loss occurs as more investments are acquired from a single issuer. Concentration of credit risk does not apply to the Authority's position in U.S. government securities-based mutual funds because the nature of mutual funds provide diversification. In order to limit concentration of credit risk of the Authority's other investments, the Authority does not invest more than 5% of its total investments in any one issuer.

Interest rate risk is the risk that during periods of rising interest rates, the yield and market value of the securities will tend to be lower than prevailing market rates; in periods of falling interest rates, the yield will tend to be higher. At June 30, 2022, non-negotiable certificates of deposit with a carrying value of \$9,354,438 and a weighted average maturity of 0.87 years and U.S. government securities-based mutual funds with a carrying value of \$5,008,933 and a weighted average maturity of 0.41 years were subject to interest rate risk. U.S. Treasury bills/notes with a carrying value of \$8,391,206 and a weighted average maturity of 0.77 years were subject to interest rate risk. At June 30, 2021, non-negotiable certificates of deposit with a carrying value of \$5,999,840 and a weighted average maturity of 0.6 years, U.S. government securities-based mutual funds with a carrying value of \$7,215,561 and a weighted average maturity of 0.1 years, and U.S. Treasury bills with a carrying value of \$7,248,028 and a weighted average maturity of 0.5 years were subject to interest rate risk.

Fair value measurements: The Authority follows GASB Statement No. 72, which provides the framework for measuring fair value. The framework provides a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (Level 1 measurements) and the lowest priority to unobservable inputs (Level 3 measurements). The inputs to the three levels of the fair value hierarchy under GASB Statement No. 72 are described as follows:

Level 1: Unadjusted quoted prices for identical assets or liabilities in active markets that the Authority has the ability to access.

Level 2: Quoted prices for similar assets or liabilities in active markets; quoted prices for identical assets or liabilities in inactive markets; inputs other than quoted prices that are observable for the asset or liability; and inputs that are derived principally from, or corroborated by, observable market data by correlation to other means. If the asset or liability has a specified (contractual) term, the Level 2 input must be observable for substantially the full term of the asset or liability.

Level 3: Valuations to which one or more significant inputs are unobservable and may include situations where there is minimal, if any, market activity in the asset or liability.

**Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 3. Investments and Fair Value Measurements (Continued)

The fair value measurement level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. All transfers between fair value hierarchy levels are recognized by the Authority at the end of each reporting period. Investments at fair value consist of the following at June 30:

	2022			Total
	Level 1	Level 2	Level 3	
Investments by fair value level:				
U.S. Treasury Bills	\$ 1,982,850	\$ -	\$ -	\$ 1,982,850
U.S. Treasury Notes	2,450,158	-	-	2,450,158
Investments measured at cost and net asset value (NAV):				
Certificates of deposit at cost				9,354,438
U.S. government securities				3,958,198
Mutual funds at NAV				5,008,933
Total investments				<u>\$ 22,754,577</u>

	2021			Total
	Level 1	Level 2	Level 3	
Investments by fair value level:				
U.S. Treasury Bills	\$ 7,248,028	\$ -	\$ -	\$ 7,248,028
Investments measured at cost and net asset value (NAV):				
Certificates of deposit at cost				5,999,840
Mutual funds at NAV				7,215,561
Total investments				<u>\$ 20,463,429</u>

Investments measured at fair value are reconciled to the statement of net position as follows at June 30:

	2022	2021
Investments measured at fair value or NAV	\$ 9,441,941	\$ 14,463,589
Investments measured at cost:		
Certificates of deposit	9,354,438	5,999,840
U.S. government securities	3,958,198	-
	<u>\$ 22,754,577</u>	<u>\$ 20,463,429</u>
Investments - Unrestricted	\$ 19,832,184	\$ 14,261,282
Investments - Restricted	2,922,393	6,202,147
	<u>\$ 22,754,577</u>	<u>\$ 20,463,429</u>

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 3. Investments and Fair Value Measurements (Continued)

There have been no significant changes in valuation techniques during fiscal years ended June 30, 2022 and 2021. U.S. Treasury bills classified in Level 1 of the fair value hierarchy are valued using unadjusted quotes of the exact security in active markets. The Authority's investments measured at NAV consist solely of mutual funds that invest in cash, U.S. Treasury bills, notes and other obligations issued or guaranteed as to principal and interest by the U.S. Government, its agencies or instrumentalities, and repurchase agreements secured by such obligations or cash. The fund seeks as high a level of current income as is consistent with liquidity and stability of principal. The Authority has no unfunded commitments related to this investment type. Shares are redeemable daily at the NAV at the time of redemption.

Note 4. Loans and Allowance for Loan Losses

The Authority purchases and holds various types of student loans as described in Note 1. The terms of these loans, which vary on an individual basis, depending upon loan type and the date the loan was originated, generally provide for repayment in monthly installments of principal and interest over a period of up to 30 years for Consolidation loans and generally up to ten years for other loans. The repayment period begins after a grace period of six months following graduation or loss of qualified student status for the Stafford and Unsubsidized Stafford loans. The repayment period for Consolidation, SLS, and PLUS loans begins within 60 days from the date the loan is fully disbursed.

During the year ended June 30, 2016, the Authority paid a premium of approximately \$253,000 on the acquisition of student loans. Unamortized premiums at June 30, 2021 were approximately \$62,000, the remaining of which was amortized over the estimated remaining life of loans purchased of five years at the time of purchase which occurred during fiscal year 2022.

Loans consist of the following as of June 30:

	2022	2021
Stafford	\$ 21,856,428	\$ 26,147,252
Unsubsidized Stafford	25,751,030	30,633,703
PLUS/ SLS	1,020,823	1,312,651
Consolidation	92,988,039	112,169,387
SHELF™	883,387	965,384
Total gross loans	<u>142,499,707</u>	<u>171,228,377</u>
Premium on purchased loans	-	61,829
Unprocessed loan payments	(80,043)	(68,820)
Allowance for loan losses	(1,403,200)	(1,506,478)
Net loans	<u>\$ 141,016,464</u>	<u>\$ 169,714,908</u>

An analysis of the change in the allowance for loan losses is as follows for the year ended June 30:

	2022	2021
Balance at beginning of year	\$ 1,506,478	\$ 1,631,216
Loans charged off	(103,278)	(124,738)
Balance at end of year	<u>\$ 1,403,200</u>	<u>\$ 1,506,478</u>

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 4. Loans and Allowance for Loan Losses (Continued)

The stated interest rates on student loans which are based on USDE regulations ranged from 1.72% to 10.0% for the fiscal years ended June 30, 2022 and 1.83% to 10.0% for the fiscal years ended June 30, 2021, depending upon the type and date of origination of the individual loan and whether the borrower had earned any of the Authority's interest rate reduction incentives. This stated interest rate is paid by the borrowers or by USDE. For loans that had the first disbursement on or after April 1, 2006, the lenders' yield on student loans is based on a quarterly calculation that uses the 1-month LIBOR. The lender yield is calculated using these quarterly average rates plus an allowable mark-up that is based on the type and date of the loan's first disbursement. If the quarterly lenders' yield on the loans is less than the stated interest rate, the lender must rebate the excess to USDE. The excess of the loans' stated interest rate over the quarterly lenders' yield is referred to as Negative SAP. The Authority's loan portfolio consisted of approximately 59.31% Negative SAP loans at June 30, 2022 and 83.40% Negative SAP loans at June 30, 2021. The calculated quarterly lenders' yield ranged from 2.34% to 4.64% for the fiscal year ended June 30, 2022 and 1.44% to 3.52% for the fiscal year ended June 30, 2021.

The FFEL Program loans are guaranteed at 98% for loans first disbursed prior to July 1, 2006 and 97% for loans first disbursed on or after July 1, 2006 by the Oklahoma State Regents for Higher Education Guaranteed Student Loan Program (State Guarantee Agency), which is reinsured by the United States Department of Education (the USDE), or guaranteed by other guarantors approved by the USDE (Guarantee Agencies). As of June 30, 2022, approximately \$141,259,000 of the Authority's outstanding loans were guaranteed at 98% or 97% of the outstanding balance, as described above.

In order for the FFEL Program student loans to be or remain guaranteed, certain due-diligence requirements in loan servicing must be met. As of June 30, 2022 and 2021, approximately \$357,000 and \$329,000, respectively, of loans were no longer considered to be guaranteed.

The Authority is also required to pay to the USDE certain lender origination and consolidation loan rebate fees. The amount of the lender fees includes a certain percentage of the gross loan amount on all FFEL Program loans originated after October 1, 1993, and a certain percentage of the carrying value of the Consolidation loans.

Student loans receivable of approximately \$110,147,000 and \$134,420,000 as of June 30, 2022 and 2021, were pledged as collateral for notes and bonds payable issued by the Authority.

Note 5. Notes and Bonds Payable

The Authority periodically issues notes and bonds for the purpose of funding student loans. All notes and bonds payable are primarily secured by student loans, related accrued interest, and by the amounts on deposit in accounts established under the respective bond resolution or financing agreement as maintained by the corporate trustees.

In October 2021, the Authority issued the Series 2021 Note to perform a current refunding and to consolidate the five outstanding bonds and notes payable into one, enabling the release of collateralized student loans from the refunded bonds and notes that were in a significantly overcollateralized position, and provide for a replacement benchmark interest rate when the monthly LIBOR rate is no longer available, currently scheduled to occur in June 2023. The Authority reduced the total debt service payments by approximately \$962,000 and achieved an economic gain (loss) of approximately \$838,000 (difference between net present value of the debt service payments on the old and the new debt).

The Authority is required to establish and maintain accounts in connection with the Series 2021 Note sufficient to satisfy the covenants under the financing and security agreement for the Series 2021 Note.

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 5. Notes and Bonds Payable (Continued)

The following schedules summarize the notes and bonds payable outstanding as of June 30, 2022 and 2021:

2022									
Year Issued	Original Amount	Interest Rate Basis	Interest Rate at Year-end	Final Maturity	Beginning balance	Additions	Reductions	Ending balance	
Notes payable from direct borrowings:									
Senior Notes, 2016 Bank Note	2016	17,725,000	M LIBOR + 0.75%	0.8%	2026	\$ 4,188,575	\$ -	\$ 4,188,575	\$ -
Senior Notes, 2017 Bank Note	2017	52,450,000	M LIBOR + 0.65%	0.7%	2032	22,385,245	-	22,385,245	-
Series 2021 Note	2021	117,220,000	M LIBOR + 0.75%	2.4%	2036	-	117,220,000	19,833,074	97,386,926
Total notes payable						26,573,820	117,220,000	46,406,894	97,386,926
Bonds payable:									
2010 Indenture of Trust Tax-Exempt LIBOR Floating Rate Bonds:									
Series 2010A-2A	2010	51,225,000	Q LIBOR + 1.20%	1.3%	2037	20,770,000	-	20,770,000	-
Series 2010A-2B	2010	44,230,000	Q LIBOR + 1.00%	1.1%	2037	17,940,000	-	17,940,000	-
2011 Indenture of Trust Taxable LIBOR Floating Rate Bonds:									
Series 2011-1	2011	205,200,000	Q LIBOR + 1.15%	1.3%	2040	28,105,000	-	28,105,000	-
2013 Indenture of Trust Taxable LIBOR Floating Rate Bonds:									
Series 2013-1	2013	211,820,000	M LIBOR + 0.50%	0.6%	2032	30,375,000	-	30,375,000	-
Total bonds payable						97,190,000	-	97,190,000	-
Discount on bonds outstanding						(448,539)	-	448,539	-
Total debt outstanding						\$ 123,315,281	\$ 117,220,000	\$ 144,045,433	\$ 97,386,926
2021									
Year Issued	Original Amount	Interest Rate Basis	Interest Rate at Year-end	Final Maturity	Beginning balance	Additions	Reductions	Ending balance	
Notes payable from direct borrowings:									
Senior Notes, 2016 Bank Note	2016	17,725,000	M LIBOR + 0.75%	0.8%	2026	\$ 5,528,284	\$ -	\$ 1,339,709	\$ 4,188,575
Senior Notes, 2017 Bank Note	2017	52,450,000	M LIBOR + 0.65%	0.7%	2032	28,140,742	-	5,755,497	22,385,245
Total notes payable						33,669,026	-	7,095,206	26,573,820
Bonds payable:									
2010 Indenture of Trust Tax-Exempt LIBOR Floating Rate Bonds:									
Series 2010A-2A	2010	51,225,000	Q LIBOR + 1.20%	1.3%	2037	25,200,000	-	4,430,000	20,770,000
Series 2010A-2B	2010	44,230,000	Q LIBOR + 1.00%	1.1%	2037	21,765,000	-	3,825,000	17,940,000
2011 Indenture of Trust Taxable LIBOR Floating Rate Bonds:									
Series 2011-1	2011	205,200,000	Q LIBOR + 1.15%	1.3%	2040	34,060,000	-	5,955,000	28,105,000
2013 Indenture of Trust Taxable LIBOR Floating Rate Bonds:									
Series 2013-1	2013	211,820,000	M LIBOR + 0.50%	0.6%	2032	37,704,000	-	7,329,000	30,375,000
Total bonds payable						118,729,000	-	21,539,000	97,190,000
Discount on bonds outstanding						(546,139)	-	97,600	(448,539)
Total debt outstanding						\$ 151,851,887	\$ -	\$ 28,731,806	\$ 123,315,281

The Series 2010A-2B and 2013-1 bonds were sold with original issue discounts. The entire balance was written off as part of the debt refunding transaction during fiscal year 2022, the unaccreted balance at June 30, 2021 was approximately \$449,000 and is classified in the statement of net position as an offset to bonds payable.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Notes to Financial Statements

Note 5. Notes and Bonds Payable (Continued)

The Authority's outstanding note payable from a direct borrowing is secured with pledges of collateral from the student loans receivable and payments received on those loans. The outstanding agreement contains provisions that, in an event of default including failure to make punctual payment of any principal or interest when it becomes due, an event of bankruptcy, or violation of any covenant or condition contained in the note agreement, the timing of repayment of outstanding amounts may become due immediately.

Contractual maturities on bonds and notes payables, assuming interest rates on variable rate debt remains at June 30, 2022 levels, are as follows:

Years ending June 30:	Bonds Payable		Notes Payable from Direct Borrowings		Total
	Principal	Interest	Principal	Interest	
2023	\$ -	\$ -	\$ -	\$ 2,320,448	\$ 2,320,448
2024	-	-	-	2,320,448	2,320,448
2025	-	-	-	2,320,448	2,320,448
2026	-	-	-	2,320,448	2,320,448
2027	-	-	-	2,320,448	2,320,448
2028-2032	-	-	-	11,602,240	11,602,240
2033-2037	-	-	97,386,926	9,839,272	107,226,198
	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 97,386,926</u>	<u>\$ 33,043,752</u>	<u>\$ 130,430,678</u>

Note 6. Retirement Plan

Plan description: The Authority contributes to the Teachers Retirement System of Oklahoma (OTRS), a cost-sharing multiple-employer public employee retirement system which is self-administered. OTRS provides retirement, disability, and death benefits to Plan members and beneficiaries. The benefit provisions are established and may be amended by the State legislature. Title 70 of the Oklahoma Statutes, Sections 17-101 through 116.9, as amended, assigns the authority for management and operation of the Plan to the Board of Trustees of OTRS. OTRS issues a publicly available annual financial report that includes financial statements and required supplementary information for OTRS. That annual report may be obtained at www.ok.gov/TRS/ or by writing to the TRS, Post Office Box 53524, Oklahoma City, Oklahoma 73152.

Benefits provided: OTRS provides defined retirement benefits based on members' final compensation, age, and term of service. In addition, the retirement program provides for benefits upon disability and to survivors upon the death of eligible members. Title 70 O. S. Sec. 17-105 defines all retirement benefits. The authority to establish and amend benefit provisions rests with the State Legislature.

Members become 100% vested in retirement benefits earned to date after five years of credited Oklahoma service. Members who joined OTRS on June 30, 1992, or prior are eligible to retire at maximum benefits when age and years of creditable service total 80. Members joining OTRS after June 30, 1992, are eligible for maximum benefits when their age and years of creditable service total 90. Members whose age and service do not equal the eligible limit may receive reduced benefits as early as age 55, and at age 62 receive unreduced benefits based on their years of service. The maximum retirement benefit is equal to 2% of final compensation for each year of credited service.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

Notes to Financial Statements

Note 6. Retirement Plan (Continued)

Final compensation for members who joined OTRS prior to July 1, 1992, is defined as the average salary for the three highest years of compensation. Final compensation for members joining OTRS after June 30, 1992, is defined as the average of the highest five consecutive years of annual compensation in which contributions have been made. The final average compensation is limited for service credit accumulated prior to July 1, 1995, to \$40,000 or \$25,000, depending on the member's election. Monthly benefits are 1/12 of this amount. Service credits accumulated after June 30, 1995, are calculated based on each member's final average compensation, except for certain employees of the two comprehensive universities. Upon the death of a member who has not yet retired, the designated beneficiary shall receive the member's total contributions plus 100% of interest earned through the end of the fiscal year, with interest rates varying based on time of service. A surviving spouse of a qualified member may elect to receive, in lieu of the aforementioned benefits, the retirement benefit the member was entitled to at the time of death as provided under the Joint Survivor Benefit Option.

Upon the death of a retired member, OTRS will pay \$5,000 to the designated beneficiary, in addition to the benefits provided for the retirement option selected by the member.

A member is eligible for disability benefits after ten years of credited Oklahoma service. The disability benefit is equal to 2.0% of final average compensation for the applicable years of credited service.

Upon separation from OTRS, members' contributions are refundable with interest based on certain restrictions provided in the Plan, or by the Internal Revenue Code (IRC).

Members may elect to make additional contributions to a tax-sheltered annuity program up to the exclusion allowance provided under the IRC under Code section 403(b).

Contributions: Employees of the Authority, as OTRS members, are required to contribute to the Plan at a rate set by State Statute (employees' contributions). The contribution rate for OTRS members is based on 7% of their covered salary. The Authority made the system members' required contribution on behalf of its employees in 2022 and 2021.

The Authority itself is required to contribute a statutory percentage of participating employees' regular annual compensation for administration of the plan (employer's contributions). The contribution rate for the Authority is 9.5%. The Authority's total payments to OTRS for the employees' and employer's contributions were approximately \$1,151,000 and \$1,004,000 for the years ended June 30, 2022 and 2021, respectively, and was equal to the required contributions plus the employees' share. In addition, the State of Oklahoma also contributes 5% of State revenues from sales, use and individual income taxes to OTRS. The amounts contributed on-behalf of the Authority and recognized in the Authority's Statement of Revenue, Expenses and Changes in Net Position as both revenues and compensation and employee benefit expense in 2022 and 2021 was approximately \$310,000 and \$382,000, respectively. These on-behalf payments do not meet the definition of a special funding situation.

Pension liabilities, pension expense, and deferred outflows of resources and deferred inflows of resources related to pensions: At June 30, 2022 and 2021, the Authority reported a liability of approximately \$5,727,000 and \$10,953,000, respectively, for its proportionate share of the net pension liability. The net pension liability was measured as of June 30, 2021, and the total pension liability used to calculate the net pension liability was determined by an actuarial valuation as of June 30, 2021. The Authority's proportion of the net pension liability was based on the Authority's contributions to OTRS relative to total contributions to OTRS by all participating employers for the year ended June 30, 2021. Based upon this information, at June 30, 2022 and June 30, 2021, the Authority's proportion was 0.112102700% and 0.115408840%, respectively.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Notes to Financial Statements

Note 6. Retirement Plan (Continued)

For the years ended June 30, 2022 and 2021, the Authority recognized pension expense of approximately \$333,000 and \$2,040,000, respectively. At June 30, 2022 and 2021, the Authority reported deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:

	June 30, 2022		June 30, 2021	
	Deferred Outflows of Resources	Deferred Inflows of Resources	Deferred Outflows of Resources	Deferred Inflows of Resources
Changes of assumption	\$ 890,910	\$ (57,035)	\$ 1,343,195	\$ (158,238)
Differences between expected and actual experience	377,630	(210,910)	533,192	(185,502)
Net difference between projected and actual investment earnings on pension plan investments	-	(2,974,604)	944,115	-
Changes in proportion and differences between Authority contributions and proportionate share of contributions	658,809	(262,128)	866,993	(76,492)
Total deferred amounts to be recognized in pension expense in future periods	1,927,349	(3,504,677)	3,687,495	(420,232)
Authority contributions subsequent to the measurement date	652,666	-	563,114	-
Total deferred amounts related to pension	<u>\$ 2,580,015</u>	<u>\$ (3,504,677)</u>	<u>\$ 4,250,609</u>	<u>\$ (420,232)</u>

Deferred pension outflows resulting from the Authority's Employer contributions subsequent to the measurement date, totaling approximately \$653,000 and \$563,000 at June 30, 2022 and 2021, respectively, will be recognized as a reduction of the net pension liability in the years ended June 30, 2023 and 2022, respectively. Deferred outflows related to the difference between projected and actual investment earnings are amortized over five years. The other amounts reported as deferred outflows of resources and deferred inflows of resources related to pensions consist of amounts originating in current and prior years and will be recognized in pension expense using the average expected remaining service life of active and inactive members of the Plan. The average expected remaining service life of the Plan is determined by taking the calculated total future service years of the Plan and is estimated at 5.27 years at June 30, 2022 and was estimated at 5.30 years at June 30, 2021.

Deferred outflows of resources and deferred inflows of resources at June 30, 2022, will be recognized in pension expense as follows:

	Deferred Outflows (Inflows)
2023	\$ (283,943)
2024	(124,034)
2025	(276,713)
2026	(892,092)
2027	(546)
	<u>\$ (1,577,328)</u>

Oklahoma Student Loan Authority
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Notes to Financial Statements

Note 6. Retirement Plan (Continued)

Actuarial assumptions: The total pension liability was determined based on an actuarial valuation prepared as of June 30, 2021, using the following actuarial assumptions:

- Actuarial cost method Entry age normal
- Inflation 2.25%
- Salary increases Composed of 2.25% wage inflation, plus 0.75% productivity increase rate, plus step-rate promotional increases for members with less than 25 years of service
- Investment rate of return 7.00%
- Retirement age Experience-based table of rates based on age, service, and gender. Adopted by the OTRS Board in July 2020 in conjunction with the five-year experience study for the period ended June 30, 2019.
- Mortality rates after retirement Males and females: 2020 GRS Southwest Region Teacher Mortality Table. Generational mortality improvements in accordance with the Ultimate MP scales are projected from the year 2020.
- Mortality rates for active members Pub-2010 Teachers Active Employee Mortality table. Generational mortality improvements in accordance with the Ultimate MP scales are projected from the year 2010.

The long-term expected rate of return on pension plan investments was determined using building block method in which best estimate ranges of expected future real rates of return (expected returns, net of pension plan investment expense and inflation) are developed for each major asset class. These ranges are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

Notes to Financial Statements

Note 6. Retirement Plan (Continued)

The target asset allocation and best estimates of arithmetic expected real rates of return for each major asset class as of June 30, 2022, are summarized in the following table:

Asset Class	Target Asset Allocation	Long-Term Expected Real Rate of Return
Domestic Equity	43.50%	4.30%
International Equity	19.00%	5.20%
Domestic Fixed Income	22.00%	0.40%
Real Estate*	9.00%	4.30%
Alternative Assets	6.50%	6.50%
Total	100.00%	

*The Real Estate total expected return is a combination of US Direct Real Estate (unleveraged) and US Value added Real Estate (unleveraged)

Discount rate: The discount rate used to measure the total pension liability was 7.00%. The projection of cash flows used to determine the discount rate assumed that contributions from Plan members will be made at the current contribution rate and that contributions from employers will be made at contractually required rates, determined by State statutes. Projected cash flows also assume the State of Oklahoma will continue contributing 5.0% of sales, use and individual income taxes, as established by statute. Based on these assumptions, OTRS' fiduciary net position was projected to be available to make all projected future benefit payments of current Plan members. Therefore, the long-term expected rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the total pension liability.

Sensitivity of the net pension liability to changes in the discount rate: The following table presents the net pension liability of the Authority calculated using the discount rate of 7.0%, as well as what the Authority's net pension liability would be if OTRS calculated the total pension liability using a discount rate that is 1-percentage point lower (6.0%) or 1-percentage point higher (8.0%) than the current rate:

	2022		
	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
Net pension liability	\$ 9,361,093	\$ 5,727,131	\$ 2,718,708

	2021		
	1% Decrease (6.00%)	Current Discount Rate (7.00%)	1% Increase (8.00%)
Net pension liability	\$ 14,617,958	\$ 10,952,567	\$ 7,918,195

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Notes to Financial Statements

Note 7. Capital Assets

	2022			
	Beginning balance	Additions	Disposals	Ending balance
Furniture and equipment	\$ 3,674,970	\$ 1,206,569	\$ 3,352	\$ 4,878,187
Computer software	2,835,328	207,186	-	3,042,514
Leasehold improvements	282,394	237,882	-	520,276
	<u>\$ 6,792,692</u>	<u>\$ 1,651,637</u>	<u>\$ 3,352</u>	<u>\$ 8,440,977</u>
Accumulated depreciation	6,445,008	282,059	3,352	6,723,715
Net capital assets	<u>\$ 347,684</u>	<u>\$ 1,369,578</u>	<u>\$ -</u>	<u>\$ 1,717,262</u>

	2021			
	Beginning balance	Additions	Disposals	Ending balance
Furniture and equipment	\$ 3,556,385	\$ 158,332	\$ 39,747	\$ 3,674,970
Computer software	2,783,854	55,808	4,334	2,835,328
Leasehold improvements	282,394	-	-	282,394
	<u>\$ 6,622,633</u>	<u>\$ 214,140</u>	<u>\$ 44,081</u>	<u>\$ 6,792,692</u>
Accumulated depreciation	6,216,185	272,865	44,042	6,445,008
Net capital assets	<u>\$ 406,448</u>	<u>\$ (58,725)</u>	<u>\$ 39</u>	<u>\$ 347,684</u>

Note 8. Commitments and Contingencies

The Authority conducts certain programs subject to audit by various federal and state agencies. Amounts challenged as a result of audits, if any, may result in refunds to these governmental agencies.

As part of the NFP servicer contract (Note 1), the Authority entered into a hosted service license agreement to use software products designed to service USDE loans. The initial term of the agreement is the later of the expiration or termination of a contract with the Department of Education as a NFP servicer or five years from the effective date. The agreement calls for minimum annual usage fees of \$450,000 during the term of the agreement. For the years ended June 30, 2022 and 2021, annual expenses related to this contract were approximately \$5,151,000 and \$4,071,000, respectively, which were included in external loan servicing fees.

Note 9. Risk Management

The Authority participates in the Oklahoma Risk Management Division's (a division of the Department of Central Services) insurance pool, which covers all governmental tort, property, vehicle, and directors and officers liability claims against the Authority. The Authority pays a yearly premium to the Department of Central Services to participate in the insurance pool. Premiums paid are not subject to retroactive adjustment.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

Notes to Financial Statements

Note 10. Subsequent Events

Subsequent events have been evaluated through November 17, 2022, the date of the financial statements were available to be issued.

President Biden announced a student loan debt relief program in August 2022 designed to discharge up to \$10,000 of student loan debt for eligible borrowers, and up to \$20,000 for eligible borrowers who received Pell Grants. Direct Loans serviced by OSLA are part of this debt relief program. FFEL loans owned by OSLA are currently not covered by the program. Eligible borrowers with qualifying loan balances up to \$10,000 (\$20,000 for Pell Grant recipients) will be fully discharged and no longer serviced by OSLA, resulting in decreased loan servicing fees. Several legal challenges to the debt relief program have been filed, and the outcome of those challenges has not been determined. The number of borrowers whose balances will be fully discharged if the program moves forward as currently structured is not yet known, but the impact on loan servicing fees is expected to be significant.

Required Supplementary Information

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Required Supplementary Information
Schedule of the Authority's Proportionate Share of the Net Pension Liability
Oklahoma Teacher's Retirement System (OTRS)
Last 10 Fiscal Years*

	2022	2021	2020	2019	2018	2017	2016
Measurement date	June 30, 2021	June 30, 2020	June 30, 2019	June 30, 2018	June 30, 2017	June 30, 2016	June 30, 2015
Authority's proportion of the net pension liability	0.11210270%	0.11540884%	0.10169906%	0.10334683%	0.09868767%	0.09932093%	0.10123064%
Authority's proportionate share of the net pension liability	5,727,131	10,952,567	6,730,444	6,246,398	6,548,331	8,322,242	6,176,715
Authority's covered payroll	5,933,632	5,961,621	5,091,758	4,723,200	4,359,537	4,450,453	4,352,484
Authority's proportionate share of the net pension liability as a percentage of its covered-employee payroll	96.52%	183.72%	132.18%	132.25%	150.21%	187.00%	141.91%
Plan fiduciary net position as a percentage of the total pension liability	80.80%	63.47%	71.56%	72.74%	69.32%	62.24%	70.31%

Notes to Schedule:

* GASB Statement No. 68 was adopted in the fiscal year ended June 30, 2015. Information prior to adoption of GASB Statement No. 68 is not available.

Note 1. Change in benefit terms: There were no significant changes to benefit provisions or other matters that affected the comparability of the information presented above.

Note 2. Change of assumptions: For the year ended June 30, 2022 & 2021, salary increases are composed of 2.25% wage inflation, plus 0.75% productivity increase rate, plus step-rate promotional increases for members with less than 25 years of service.

For the year ended June 30, 2022 & 2021, the retirement age was determined using the experience-based table developed from a five-year experience study for the period ended June 30, 2019. This table was adopted by the OTRS Board in July 2020.

For the year ended June 30, 2022 & 2021, the mortality rates after retirement for males and females were determined using the 2020 GRS Southwest Region Teacher Mortality Table with generational mortality improvements in accordance with the Ultimate MP scales are projected from the year 2020. Mortality for active members were determined using the Pub-2010 Teachers Active Employee Mortality table. Generational mortality improvements in accordance with the Ultimate MP scales are projected from the year 2010.

For the year ended June 30, 2022 & 2021, investment return was 7.00% per year, net of investment-related expenses, composed of an assumed 2.25% inflation rate and a 4.75% real rate of return.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Required Supplementary Information
Schedule of the Authority's Contributions
Oklahoma Teacher's Retirement System (OTRS)
Last 10 Fiscal Years**

	2022	2021	2020	2019	2018
Contractually required contribution	\$ 652,666	\$ 563,114	\$ 562,313	\$ 483,717	\$ 448,704
Contributions in relation to the contractually required contribution	(652,666)	(563,114)	(562,313)	(483,717)	(448,704)
Contribution deficiency (excess)	\$ -	\$ -	\$ -	\$ -	\$ -
Authority's covered payroll	\$ 6,707,366	\$ 5,933,632	\$ 5,961,621	\$ 5,091,758	\$ 4,723,200
Contributions as a percentage of covered payroll	9.50%	9.50%	9.50%	9.50%	9.50%
	2017	2016	2015	2014	2013
Contractually required contribution	\$ 414,156	\$ 422,793	\$ 413,486	\$ 420,981	\$ 384,832
Contributions in relation to the contractually required contribution	(414,156)	(422,793)	(413,486)	(420,981)	(384,832)
Contribution deficiency (excess)	\$ -	\$ -	\$ -	\$ -	\$ -
Authority's covered payroll	\$ 4,359,537	\$ 4,450,453	\$ 4,352,484	\$ 4,431,379	\$ 4,050,863
Contributions as a percentage of covered payroll	9.50%	9.50%	9.50%	9.50%	9.50%

Methods and assumptions used to determine contributions rates:

Actuarial cost method	Entry are normal
Amortization method	Level percentage of payroll
Remaining amortization period	20 years
Asset valuation method	5-year smooth market
Inflation	2.25%
Salary increase	Composed of 2.25% inflation, plus 0.75% productivity increase rate, plus step-rate promotional increases for members with less than 25 years of service.
Investment rate of return	7.00%
Retirement age	Experience based table of rates based on age, service and gender.
Mortality	2020 GRS Southwest Region Teacher Mortality Table for males and females.



RSM US LLP

**Report on Internal Control Over Financial Reporting and on
Compliance and Other Matters Based on an Audit of Financial
Statements Performed in Accordance with *Government Auditing Standards***

Independent Auditor's Report

Board of Trustees
Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Oklahoma Student Loan Authority (the Authority), a component unit of the State of Oklahoma as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, and have issued our report thereon dated November 17, 2022.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority'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 that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. We identified certain deficiencies in internal control, described in the accompanying *Schedule of Findings and Questioned Costs* as item 2022-001 that we consider to be significant deficiency.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority'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*.

Authority's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the findings identified in our audit and described in the accompanying *schedule of findings and questioned costs*. The Authority's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

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 Authority'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.

RSM US LLP

Oklahoma City, Oklahoma
November 17, 2022

**Report on Compliance for the Major Federal Program and Report on
Internal Control Over Compliance Required by the
Uniform Guidance**

Independent Auditors' Report

Board of Trustees
Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Report on Compliance for the Major Federal Program

Opinion on the Major Federal Program

We have audited Oklahoma Student Loan Authority's (the Authority), a component unit of the State of Oklahoma, compliance with the types of compliance requirements identified as subject to audit in the *OMB Compliance Supplement* that could have a direct and material effect on the Authority's major federal program for the year ended June 30, 2022. The Authority's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Authority complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended June 30, 2022.

Basis for Opinion on the Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States (*Government Auditing Standards*); and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for the major federal program. Our audit does not provide a legal determination of the Authority's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to the Authority's federal program.

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Authority's compliance based on our audit. 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, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Authority's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance, we:

- exercise professional judgment and maintain professional skepticism throughout the audit.
- identify and assess the risks of material noncompliance, 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 Authority's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- obtain an understanding of the Authority's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Report on Internal Control Over Compliance

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

RSM US LLP

Oklahoma City, Oklahoma
November 17, 2022

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Schedule of Expenditures of Federal Awards
Year Ended June 30, 2022

Federal Agency/Program Title	Federal Assistance Listing Number (ALN)	Provided to Subrecipients	Federal Expenditures
U.S. Department of Education			
Federal Family Education Loan Program—beginning balance of outstanding guaranteed loans	84.032L	\$ -	\$ 169,933,572
Federal Family Education Loan Program—interest subsidies	84.032L	-	233,205
Total expenditures of federal awards		\$ -	\$ 170,166,777

See notes to schedule of expenditures of federal awards.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Notes to Schedule of Expenditures of Federal Awards
June 30, 2022**

Note 1. Basis of Presentation

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the Oklahoma Student Loan Authority (the Authority) under programs of the federal government for the year ended June 30, 2022. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of the Authority, it is not intended to and does not present the financial position, changes in net position, or cash flows of the Authority.

Note 2. Summary of Significant Accounting Policies

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Negative amounts shown on the Schedule, if any, represent adjustments or credits made in the normal course of business to amounts reported as expenditures in prior years.

Note 3. Nature of Program

The purpose of the Authority is to provide loan funds to qualified persons at participating postsecondary educational institutions. The student loans held by the Authority under the Federal Higher Education Act of 1965, as amended, include Federal Stafford (Stafford) Loans, Unsubsidized Stafford Loans for Middle Income Borrowers (Unsubsidized Stafford), Federal Supplemental Loans for Students (SLS), Federal PLUS Loans for Parents (PLUS), Federal PLUS Loans for Graduate or Professional Students (GRAD), and Federal Consolidation Loans (Consolidation).

The FFEL Program loans are guaranteed at 98% for loans first disbursed prior to July 1, 2006 and 97% for loans first disbursed on or after July 1, 2006 by the Oklahoma State Regents for Higher Education Guaranteed Student Loan Program (State Guarantee Agency), which is reinsured by the United States Department of Education (the USDE), or guaranteed by other guarantors approved by the USDE (Guarantee Agencies). As of June 30, 2022, approximately \$141,259,000 of the Authority's outstanding loans were guaranteed at 98% or 97% of the outstanding balance, as described above.

Note 4. Indirect Costs

In accordance with Uniform Guidance Subpart E Section 200.414, recipients of federal awards are allowed a 10% de minimis administrative cost rate. For the year ended June 30, 2022, the FFEL Program did not provide for additional administrative costs. Therefore, the Authority did not elect to use the 10% de minimis indirect cost rate allowed under the Uniform Guidance.

Note 5. Relationship to Federal Financial Reports

Amounts reported in the accompanying schedule may differ from amounts requested by the Authority for the FFEL Program due to the U.S. government agency's discretionary authority to reduce interest subsidies, special allowance payments, or a combination of both by an amount equal to loan origination fees or lender's fees. Additionally, the amount of special allowance payments is determined by a U.S. government agency using information provided by the Authority; consequently, the amounts are not calculated by the Authority.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Notes to Schedule of Expenditures of Federal Awards
June 30, 2022**

Note 6. Federal Expenditures

Due to the nature of the federal awards for the fiscal year ended June 30, 2022, no specific expenditures were made by the FFEL Program; receipts represent subsidies from a U.S. government agency. Such programs are described in the notes to the basic financial statements. The accompanying schedule of expenditures of federal awards includes the beginning balance of loans outstanding under the FFEL Program since the Authority has continuing compliance requirements with respect to those loans, and also presents the total interest subsidies received from the USDE during the year related to the FFEL Program and spent for debt service. All federal awards received directly from federal agencies are included on the schedule.



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SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

Finding 2021-001

Audit Finding: The Authority uses Dynamics Great Plains for its financial accounting and reporting system, including general ledger. Throughout all the fiscal year ended June 30, 2021, the accounting manager had “super user” access to the system, with the ability to post manual journal entries to the general ledger. In addition, the accounting manager also performs reconciliations of certain general ledger accounts.

Criteria: Access within the Authority’s accounting system should be restricted in such a manner that sufficient segregation of duties is achieved to prevent potential override of controls by users of the system.

Condition and Context: The accounting manager prepares manual journal entries and posts them to the general ledger, as well as preparing reconciliations of certain general ledger accounts, and reviewing other reconciliations. Some reconciliations are performed by staff members that are independent of the transaction cycles, but report to the accounting manager. The level of detail and documentation of some of the reconciliation reviews may not be sufficient to prevent or detect and correct inappropriate or fraudulent transactions from occurring on a timely basis.

Cause: The accounting manager has been granted the level of access which is that of a super user. In addition, the accounting manager can also post manual journal entries to the Authority’s general ledger, and there is no specific review performed of those journal entries by someone other than the preparer.

Effect: There were no misstatements noted as a result of this finding. However, the finding does present the risk that inappropriate or fraudulent activity could be recorded and not detected, causing a material misstatement to the financial statements.

Auditors’ Recommendation: We recommend that “super user” access of the Accounting Manager be removed, and such access be restricted only for what is necessary to perform assigned responsibilities. We also recommend that all manual journal entries prepared by the accounting manager be reviewed by supervisors prior to the time that the super-user access was removed.

Current Status: The super-user access of the Accounting Manager was removed in July 2021, and access was restricted only for what is necessary to perform assigned responsibilities. The Director – Finance and Accounting will review a system-generated report of all manual entries prepared by the accounting manager for appropriateness for the period prior to the time the superuser access was removed.

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Schedule of Findings and Questioned Costs
June 30, 2022

I. Summary of Auditor's Results:

Financial Statements:

Type of auditor's report issued: Unmodified

Internal control over financial reporting:

- Material weakness(es) identified? Yes No
- Significant deficiency(ies) identified? Yes None reported

Noncompliance material to financial statements noted? Yes No

Federal Awards:

Internal control over major programs:

- Material weakness(es) identified? Yes No
- Significant deficiency(ies) identified? Yes None reported

Type of auditors' report issued on compliance for major programs: Unmodified

- Any audit findings disclosed that are required to be reported in accordance with section 2 CFR 200.516(a)? Yes No

Identification of major programs:

Federal ALN	Name of Federal Program
84.032L	Federal Family Education Loan Program

Dollar threshold used to distinguish between type A and type B programs: \$3,000,000

Auditee qualified as low-risk auditee? Yes No

Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma

Schedule of Findings and Questioned Costs (Continued)
June 30, 2022

II. Findings Related to the Financial Statement Audit as Required to be Reported in Accordance with *Government Auditing Standards*:

A. Internal Control

Finding Number 2022-001: Financial Accounting and Reporting under US GAAP

Condition and Context followed by Criteria

The Authority is required to maintain books and records to report under accounting principles generally accepted within the United States of America (US GAAP) as promulgated by the Governmental Accounting Standards Board (GASB). During our audit of the Authority's financial statements, we identified several areas for which the Authority's procedures for monitoring the requirements of new accounting standards and the accounting for transactions outside of the ordinary course of business lacked sufficient evaluation and review which resulted in errors in the evaluation and recording of account balances and required disclosures as noted below:

- **Long-term Debt Refunding:** During fiscal year 2021, the Authority issued the Series 2021 Note to perform a current refunding and consolidate the five outstanding bonds and notes payable into one outstanding series. In recognizing the effects of the transaction on the books, the Authority did not perform an evaluation of the accounting gain or loss on the current refunding which resulted in the Authority recognizing the entirety of the impact of the refunding transaction during the year, rather than reporting the result as a deferred outflow of resources or deferred inflow of resources as required. This error was corrected, and an adjustment was made to record a deferred loss on refunding as a deferred outflow of resources in the amount of \$1.6 million at the time of the transaction, decreased by the recognition of amortization for the period of \$106 thousand at fiscal year-end under the straight-line method of amortization.

GASB Codification Section D20 *Debt Extinguishments and Troubled Debt Restructuring* requires for current refundings resulting in the defeasance of debt reported by proprietary funds, the difference between the reacquisition price and the net carrying amount of the old debt be reported as a deferred outflow of resources or deferred inflow of resources and recognized as a component of interest expense in a systematic and rational manner over the remaining life of the old debt or the life of the new debt, whichever is shorter.

- **Leases:** During fiscal year 2021, the Authority was required to implement the effects of GASB Statement No. 87 *Leases* (GASB 87) on its books and records. The Authority did not timely review the impact of the new standard and did not initially perform a detailed analysis to support their conclusion that the effects of the standard were not material to the Authority's operations. After follow-up discussion and review of additional analysis, it was noted that the impact of the standard does not appear to have a material impact on the Authority.

GASB 87 became effective for entities with fiscal years ending after June 15, 2021. The leasing reporting standards changed and the change requires an assessment of leases to determine the existence of all leases. For leases, the Authority should recognize a lease liability and a right to use asset at the commencement of the lease term, unless the lease is a short-term lease or it transfers ownership of the underlying asset. The lease liability should be measured at the present value of payments expected to be made during the lease term (less any lease incentives). The lease asset should be measured at the amount of the initial measurement of the lease liability, plus any payments the Authority made to the lessor at or before the commencement of the lease term and certain direct costs. The Authority should reduce the lease liability as payments are made and recognize an outflow

Oklahoma Student Loan Authority
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Schedule of Findings and Questioned Costs (Continued)
June 30, 2022

of resources (for example, expense) for interest on the liability and should amortize the lease asset in a systematic and rational manner over the shorter of the lease term or the useful life of the underlying asset. The notes to financial statements should include a description of leasing arrangements, the amount of lease assets recognized, and a schedule of future lease payments to be made.

- **Other Post-Employment Benefits (OPEB):** During fiscal year 2018, the Authority was required to implement the effects of GASB Statement No. 75 *Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions* (GASB 75) on its books and records. The Authority evaluated the impact of the standard at the time and provided support for the fact that the effects of the requirements of the standard were not material to the Authority's operations, therefore the decision was made to pass on the reporting requirements. During the current fiscal year 2021 audit, we identified that the Authority did not properly monitoring and confirm the initial conclusion continued to apply due to a lack of updating the analysis for the Authority's participation in one of two plans which provide Authority employees with post-employment benefits. After follow-up discussion and review of additional analysis, it was noted that the impact of the standard continues to not appear to have a material impact on the Authority.

GASB 75 became effective for entities with fiscal years ending after June 15, 2017. The Authority is required to recognize and measure liabilities, deferred outflows of resources, deferred inflows of resources, and expense for all defined benefit OPEB Plans for which Authority employees and retirees are participants. Current standards identify the methods and assumptions that are required to be used to project benefit payments, discount projected benefit payments to their actuarial present value, and attribute that present value to periods of employee service. In addition, the Authority is also required to incorporate note disclosure and required supplementary information requirements about defined benefit OPEB.

Cause: The Authority notes that controls are in place over financial reporting, however, due to the constraints put on Authority resources relating to the federal government's pending student loan debt relief program, the monitoring of the effects of new standards which were not expected to be material and the effects of outside of the ordinary transactions were not top of mind during the financial reporting close process in the current period like they normally would be.

Effect: We noted that management did not timely complete an assessment over the standards that impacted its basic financial statements. Management elected to not report the requirements of GASB 87 or GASB 75, respectively, which directly relate to leases and their participation in a cost sharing plan and a single employer OPEB Plan for which they participate. The effects of which result in uncorrected misstatements of approximately \$1.4 million for a lease liability and right of use asset as well as approximately a \$252 thousand OPEB liability as of June 30, 2022. Additionally, a corrected audit adjustment for the refunding resulted in a deferred outflow of resources of approximately \$1.5 million with an offsetting decrease to interest expense for \$1.5 million.

Auditors' Recommendation: We recommend the performance of a comprehensive annual process to address changes in its financial reporting framework. The implementation of an annual review of changes in its reporting framework could help to supplement the Authority's year end reporting process and the related impact from new reporting standards. The annual review may also be used to inform and train all employees of the annual requirements and capture and report the impact on the Authority basic financial statements. Such an annual review could also greatly minimize the time required to complete the year reporting process.

Management's Response: Refer to the Corrective Action Plan.

**Oklahoma Student Loan Authority
A Component Unit of the State of Oklahoma**

**Schedule of Findings and Questioned Costs (Continued)
June 30, 2022**

B. Compliance Findings

No matters were reported.

III. Findings Required to be Reported in Accordance with the Uniform Guidance:

A. Internal Control

No matters were reported.

B. Compliance Findings

No matters were reported.



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CORRECTIVE ACTION PLAN Year Ended June 30, 2022

Identifying Number: 2022-001

Finding: Financial Accounting and Reporting under US GAAP

Management's Response and Corrective Action Plan:

OSLA agrees with the finding and will implement an annual review of changes in its reporting framework and incorporate review of new reporting standards, significant transactions and other changes that could affect the financial statements. The annual review will include accounting staff involved in the financial statement preparation process. The review will take place near the end of March 2023 to encompass changes and significant transactions, as well as coordinating new standard implementation with the auditors.

Anticipated Completion Date: April 2023

Contact Person: Debbie Robinson, Accounting Manager