



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

**AGREED UPON PROCEDURES REPORT**

**FOR THE YEAR ENDED DECEMBER 31, 2023**

## CONTENTS

	<u>Page</u>
<u>Independent Accountants' Report</u>	1-2
<u>Schedule of Agreed-Upon Procedures and Results – Exhibit A</u>	3-4
<u>Lender Servicer Attestation Engagement Reports</u>	
<u>Lender and Auditor Information Sheet</u>	
<u>Management Representations and Management Assertions</u>	

## INDEPENDENT ACCOUNTANTS' REPORT

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

We have performed the procedures set forth in the "Schedule of Agreed-Upon Procedures and Results" related to Louisiana Public Facilities Authority's compliance with the requirements described in Chapter 3 of the 2020 edition of the U.S. Department of Education's *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans* (Guide) relative to Louisiana Public Facilities Authority's 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's participation in the Federal Family Education Loan (FFEL) program, during the year ended December 31, 2023. Management is responsible for its compliance with the requirements of laws, regulations, contracts, and grant agreements applicable to the FFEL program.

Louisiana Public Facilities Authority has agreed to acknowledge that the procedures performed are appropriate to meet the intended purpose of assisting the users in determining Louisiana Public Facilities Authority's compliance with requirements applicable to the FFEL Program. Additionally, the U.S. Department of Education has agreed to and acknowledged that the procedures performed are appropriate for their purposes. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The accompanying "Schedule of Agreed-Upon Procedures and Results" sets forth the agreed-upon procedures and the results of applying these procedures.

We were engaged by Louisiana Public Facilities Authority to perform this agreed-upon procedures engagement and conducted our engagement in accordance with the Guide; attestation standards established by the AICPA; and the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on Louisiana Public Facilities Authority's compliance with the specified requirements. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Louisiana Public Facilities Authority and to meet our ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

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

The purpose of this report is intended solely to describe the scope of testing performed on the Louisiana Public Facilities Authority's compliance with requirements applicable to the FFEL program, as required by the U.S. Department of Education, and the results of that testing, and not to provide an opinion on control or compliance. Accordingly, this report is not suitable for any other purpose.

*EisnerAmper LLP*

EISNERAMPER LLP  
Baton Rouge, Louisiana  
June 20, 2024

EISNERAMPER  
LLP



## **EXHIBIT A**

### **SCHEDULE OF AGREED-UPON PROCEDURES AND RESULTS**

<b>Agreed-Upon Procedures</b>	<b>Results</b>
<p><b>Lender Servicer Compliance Report:</b> Obtain and review any lender servicer compliance report package(s) used by the lender to satisfy the alternative engagement approach and ascertain that the report package(s) met the requirements of Chapter 3, Section C.1 of the 2020 edition of the U. S. Department of Education's <i>Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans</i> (Guide) related to:</p> <ul style="list-style-type: none"><li>a) The length and end date of the audit or attestation period.</li><li>b) The scope of the audit or attestation engagement.</li><li>c) The professional standards and audit requirements the audit or attestation was performed in accordance with.</li><li>d) The findings presented in the audit or attestation engagement.</li></ul>	<p>The lender servicer compliance report package(s) used by the lender to satisfy the alternative engagement approach agreed to the requirements of Chapter 3, Section C.1 of the 2020 edition of the U. S. Department of Education's <i>Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans</i> (Guide).</p>
<p><b>Lender Servicer Compliance Findings:</b></p> <p>(1) Using the lender servicer contracts and the lender servicer compliance report package(s) obtained in agreed-upon procedure C.1.a, determine if there were findings of noncompliance in the lender servicer(s) compliance report for any compliance function for which the lender has contracted with the lender servicer(s) to perform.</p>	<p>There were no findings of noncompliance in the lender servicer(s) compliance report(s) for compliance functions for which the lender had contracted with the lender servicer(s) to perform.</p>

## **INFORMATION SHEET**

### **Lender Information**

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

### **Lender Servicer Information**

Lender Servicer: Nelnet Loan Services (Lender ID 805178)  
Lender Servicer I.D. Number: 700121

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

Lender Servicer: Higher Education Servicing Corporation (Lender ID 805149 and 805178)  
Lender Servicer I.D. Number: 700064

### **Audit Firm Information**

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

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INFORMATION OF EDFINANCIAL SERVICES, LLC  
Disclosure to third parties without express written consent  
of Edfinancial Services, LLC is hereby prohibited.



Knoxville, TN

**COMPLIANCE ATTESTATION ENGAGEMENT OF THE  
FEDERAL FAMILY EDUCATION LOAN PROGRAM  
AND  
INDEPENDENT ACCOUNTANT'S REPORT**

**FOR THE PERIOD:  
JANUARY 1, 2023 TO JUNE 30, 2023**



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

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EDFINANCIAL SERVICES, LLC

COMPLIANCE ATTESTATION ENGAGEMENT OF THE  
FEDERAL FAMILY EDUCATION LOAN PROGRAM  
AND  
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FOR THE PERIOD JANUARY 1, 2023 TO JUNE 30, 2023

TABLE OF CONTENTS

	<u>PAGE</u>
Lender Servicer and Auditor Information Sheet.....	1
Independent Accountant’s Report on Management’s Assertion on Compliance with the Federal Family Education Loan Program Required by the U.S. Department of Education’s Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Services Administering Federal Family Education Loan Program .....	2 - 3
Schedule of Findings and Questioned Costs.....	4
Summary Schedule of Prior Findings .....	5



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**LENDER SERVICER AND AUDITOR INFORMATION SHEET**

**Edfinancial Services, LLC**  
**Knoxville, TN**  
**January 1, 2023 - June 30, 2023**

**Servicer Information:**

Lender ID Number(s): 700129  
Auditee Contact: Wanda Hall, Chief Compliance Officer  
Auditee Email: whall@edfinancial.com  
Auditee Phone: (800) 337-6884

**Auditor Information:**

Audit Firm: KraftCPAs PLLC  
Firm Address: 555 Great Circle Road,  
Firm City, State: Nashville, TN 37228  
Firm License Number: TN License #19537  
Primary Auditor: Sean Owens, Member  
Primary Email: sowens@kraftcpas.com  
Primary Phone: (615) 242-7351

**LISTING OF LENDER CLIENTS**

ID Number	Name of Lender	City	State
805149, 805178	LELA	Baton Rouge	LA
805725	cPort Credit Union	Portland	ME
824573, 833669	Nelnet	Lincoln	NE
826294	Bath Savings	Bath	ME
826351, 824697	IDAPP	Deerfield	IL
826509	ASLA	Little Rock	AR
828614	CSLF	Hartford	CT
829114	Otis Federal Credit Union	Jay	ME
833646	First Financial Bank	El Dorado	AR
833805	Redstone Federal Credit Union	Huntsville	AL
834097, 834544	North Texas	Arlington	TX
834563	Edfinancial	Knoxville	TN

INDEPENDENT ACCOUNTANT'S REPORT ON MANAGEMENT'S ASSERTION ON  
COMPLIANCE WITH THE FEDERAL FAMILY EDUCATION LOAN PROGRAM REQUIRED  
BY THE U.S. DEPARTMENT OF EDUCATION'S GUIDE FOR FINANCIAL STATEMENT  
AUDITS AND COMPLIANCE ATTESTATION ENGAGEMENTS OF LENDER SERVICES  
ADMINISTERING FEDERAL FAMILY EDUCATION LOAN PROGRAM

Board of Directors  
Edfinancial Services, LLC  
Knoxville, Tennessee

We have examined management of Edfinancial Services, LLC's assertion that Edfinancial Services, LLC ("Edfinancial") complied with the compliance requirements regarding Interest Benefits and Special Allowance Payments; Loan Records and Administration; Payment Processing; and Due Diligence, Timely Claim Filing, and Curing Violations described in Chapter 3 of the 2020 edition of the U.S. Department of Education's *Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Servicers Administering Federal Family Education Loan Program* (the "Guide") relative to Edfinancial's participation in the Federal Family Education Loan ("FFEL") program, for the period January 1, 2023 to June 30, 2023. Edfinancial's management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion about Edfinancial's compliance with the compliance requirements referred to above, based on our examination.

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

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

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

In our opinion, management's assertion that Edfinancial complied with the compliance requirements referred to above for the period January 1, 2023 to June 30, 2023, is fairly stated, in all material respects.

This report is intended solely for the information and use of the U.S. Department of Education, the management of Edfinancial and the specified lenders and the independent auditors of such lenders and is not intended to be and must not be used by anyone other than these specified parties. The purpose of this report is to examine management's assertion about compliance with the compliance requirements referred to above relative to Edfinancial's participation in the FFEL program, for the period January 1, 2023 to June 30, 2023. The report is not suitable for any other purpose.

*Kraft CPAs PLLC*

Nashville, Tennessee  
September 20, 2023

PROPRIETARY AND CONFIDENTIAL  
INFORMATION OF EDFINANCIAL SERVICES, LLC  
Disclosure to third parties without express written consent  
of Edfinancial Services, LLC is hereby prohibited.

EDFINANCIAL SERVICES, LLC

SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
FOR THE PERIOD JANUARY 1, 2023 TO JUNE 30, 2023

There were no findings of noncompliance, significant deficiencies, and material weaknesses identified with the requirements specified in Chapter 3 of the Guide during the compliance attestation engagement for the period January 1, 2023 to June 30, 2023.

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EDFINANCIAL SERVICES, LLC

SUMMARY SCHEDULE OF PRIOR FINDINGS  
FOR THE YEAR ENDED DECEMBER 31, 2022

There were no findings of noncompliance, significant deficiencies, and material weaknesses identified with the requirements specified in Chapter 3 of the Guide during the prior compliance attestation engagement for the year ended December 31, 2022.



**NELNET, INC.**

Lincoln, Nebraska

Compliance Attestation Engagement  
of the Federal Family Education Loan Program

For the Fiscal Year ended December 31, 2023

**NELNET, INC.**

**Table of Contents**

	<b>Page</b>
Independent Accountants' Examination Report	1
Report on Management's Assertions on Compliance with Specified Federal Family Education Loan Program Requirements	3
Schedule of Findings and Questioned Amounts	5
Practitioner's Comments on Prior Year's Examination Resolution Matters Relating to the FFEL Program	6
<b>Appendix</b>	
A Background	7
B Listing of Lender IDs Covered by Compliance Attestation	9



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

Suite 1120  
1248 O Street  
Lincoln, NE 68508-1493

## Independent Accountants' Examination Report

The Board of Directors  
Nelnet, Inc.:

Report on Management's Assertion on Nelnet, Inc.'s compliance with compliance requirements referred to below relative to Nelnet, Inc.'s participation in the FFEL program for the year ended December 31, 2023.

### *Opinion*

We have examined management of Nelnet, Inc.'s assertion that Nelnet, Inc. complied with the compliance requirements regarding Interest Benefits and Special Allowance Payments; Loan Records and Administration; Payment Processing; and Due Diligence, Timely Claim Filing, and Curing Violations described in Chapter 3 of the 2020 edition of the U.S. Department of Education's *Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Servicers Administering Federal Family Education Loan Program Loans* (Guide) relative to Nelnet, Inc.'s participation in the Federal Family Education Loan (FFEL) program, for the year ended December 31, 2023. Nelnet, Inc.'s management is responsible for its assertions. Our responsibility is to express an opinion on management's assertion about Nelnet, Inc.'s compliance with the compliance requirements referred to above, based on our examination.

In our opinion, Management's Assertion is fairly stated, in all material respects.

### *Basis for Opinion*

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants; the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the Guide. We are required to be independent and to meet our other ethical requirements in accordance with relevant ethical requirements related to the engagement. We believe that the evidence we have obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

The purpose of this report is to evaluate compliance with the compliance requirements referred to above relative to Nelnet, Inc.'s participation in the FFEL program, for the year ended December 31, 2023. This report is not suitable for any other purpose.

### *Management's Responsibilities*

Management of Nelnet, Inc. is responsible for:

- Nelnet, Inc.'s compliance with the Guide and its assertion;
- designing, implementing and maintaining internal control relevant to compliance with the Guide;
- identifying the specified requirements per the Guide and selecting or developing suitable criteria (if applicable), including interpreting such requirements when there are varying interpretations; and
- evaluating Nelnet, Inc.'s compliance with the Guide.





### *Our Responsibilities*

The attestation standards established by the American Institute of Certified Public Accountants require us to:

- plan and perform the examination to obtain reasonable assurance about whether Management's Assertion is fairly stated, in all material respects; and
- express an opinion on Management's Assertion, based on our examination.

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about whether Management's Assertion is fairly stated that is sufficient and appropriate to provide a basis for our opinion. The nature, timing, and extent of the procedures selected depended on our judgment, including an assessment of the risks of material misstatement of Management's Assertion, whether due to fraud or error. We identified and assessed the risks of material misstatement of Management's Assertion through understanding the Guide and the engagement circumstances. We also obtained an understanding of the internal control relevant to Nelnet, Inc.'s compliance with the Guide in order to design procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of internal controls. Our examination does not provide a legal determination on Nelnet, Inc.'s compliance with the Guide.

**KPMG LLP**

Lincoln, Nebraska  
March 4, 2024



March 4, 2024

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

The management of Nelnet, Inc. (Nelnet) provides these assertions to your firm because it is conducting an engagement of Nelnet's compliance with the U.S. Department of Education Office of Inspector General's *Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Servicers Administering the Federal Family Education Loan Program* (the Guide) for the year ended December 31, 2023. The purpose of the compliance engagement is to express an opinion about whether Nelnet has complied with the requirements, described in the following subsections of Chapter 3, Section C of the Guide:

- §C.1.1 Interest Benefits and Rebate Fees;
- §C.1.2 Special Allowance Payments<sup>1</sup>;
- §C.2.1 Loan Records;
- §C.2.2 Student Status;
- §C.2.3 Loan Sales, Purchases, and Transfers;
- §C.3.1 Payment Processing;
- §C.4.1 Due Diligence in the Collection of Delinquent Loans;
- §C.4.2 Timely Claim Filings; and
- §C.4.3 Curing Due Diligence and Timely Claim Filing Violations

We also represent that the management of Nelnet:

- Acknowledges and accepts responsibility for its compliance with the specified requirements;
- Acknowledges and accepts responsibility for establishing an effective internal control structure over compliance;
- Has evaluated its compliance with the specified requirements or its controls for ensuring compliance and detecting noncompliance with requirements, as applicable;
- Asserts that, based on its evaluation of the requirements identified in Chapter 3, Section C of the U.S. Department of Education Office of Inspector General's *Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Servicers Administering the Federal Family Education Loan Program*, that Nelnet is in compliance with

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<sup>1</sup> Within Section C.1.2 (Special Allowance Payments) of the guide, C.1.2.b and C.1.2.c requirements related to accuracy of reporting 9.5 percent floor loans and C.1.2.f requirements related to loans held as trustee on behalf of a government or non-profit entity are not applicable to Nelnet's servicing of its lender clients.






those requirements and the internal controls relating to those requirements are effective;

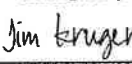
- Has disclosed to you, the auditor, all known noncompliance;
- Has made available to you, the auditor, all documentation related to compliance with the specified requirements;
- Has disclosed any communications from regulatory agencies, internal auditors, and other auditors concerning possible noncompliance with the specified requirements, including communications received between the end of the period addressed in the written assertion and the date of the auditor's report;
- Has disclosed any known noncompliance occurring subsequent to the period for which, or date we are making these assertions, March 4, 2024; and
- Has not provided any interpretations to you, the auditor, of compliance requirements that have varying interpretations.

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

Sincerely,

DocuSigned by:  
  
DCEB8C8D4C0B04DZ...

Jeff Noordhoek  
Chief Executive Officer

DocuSigned by:  
  
EAS091FA1624A3...

Jim Kruger  
Chief Financial Officer



**NELNET, INC.**

**Schedule of Findings and Questioned Amounts**  
**Years ended December 31, 2023 and 2022**

None noted.

**NELNET, INC.**

Summary Schedule of Prior Findings  
Years ended December 31, 2023 and 2022

None noted.

**NELNET, INC.**

Background

December 31, 2023

Lenders participating in the Federal Family Education Loan (FFEL) Program frequently engage servicer organizations (servicers) to perform certain functions relating to the administration of that program. Third-party servicers that enter into contracts to administer any aspect of a participating lender's FFEL Program, as provided under Title 34 of the Code of Federal Regulation (C.F.R.) Part 682, are required to submit annual audited financial statements in accordance with 34 C.F.R. §668.23(d)(5). Additionally, Section 428(b)(1)(U) of the Higher Education Act of 1965, as amended, and 34 C.F.R. §682.416(e) require all servicers to have an annual compliance audit performed by a nonfederal auditor. All financial statement audits and compliance attestation engagements conducted to satisfy the statutory and regulatory requirements cited above, except for audits of lenders or servicers that are nonprofit or governmental organizations, must be done in accordance with the Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Servicers Administering Federal Family Education Loan Program Loans (the Guide) dated September 2020.

As it relates to the lender compliance attestation engagement, lenders using a third-party service organization(s) to service all or part of its FFEL Program loan portfolio may not be able to make all of the assertions required in Chapter III of the Guide for Financial Statement Audits and Compliance Attestation Engagements of Lender Servicers Administering Federal Family Education Loan Program Loans (the Lender Guide) dated September 2020. In those situations, the Department of Education will accept, as meeting the lender compliance attestation engagement requirement, an independent accountants' report based upon an "alternative or combined" engagement as defined in Chapter III Subsection D of the Lender Guide. The lender must obtain from the service organization an audit/attestation report that meets the requirements described in Chapter III Subsection D of the Lender Guide.

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

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

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

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

## Appendix A

### **NELNET, INC.**

Background

December 31, 2023

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

## Appendix B

### NELNET, INC.

#### Listing of Lender IDs Covered by Compliance Attestation

December 31, 2023

700204	819958	829077	832124	833193	833923
800061	820174	829212	832139	833220	833924
805178	820682	829293	832218	833253	833934
808170	820685	829324	832275	833307	833955
808543	820694	829346	832286	833358	834006
808851	821013	829414	832292	833405	834071
810436	822051	829512	832336	833456	834076
810815	822218	829565	832347	833500	834097
811025	822440	829833	832379	833528	834119
811303	822605	829928	832407	833529	834202
811304	823247	830091	832438	833555	834223
811911	823459	830160	832463	833570	834336
812089	824038	830241	832494	833596	834409
813125	824573	830267	832630	833637	834416
813146	824945	830332	832637	833668	834453
813574	825240	830336	832848	833669	834455
813760	825585	830351	832868	833670	834469
814657	826191	830370	832892	833733	834477
815675	826509	830492	832897	833751	834508
815901	826584	830720	832994	833752	834543
817517	826910	830772	833016	833760	834544
818505	827104	830922	833017	833764	834550
818611	827656	830977	833049	833770	834576
819129	828416	831221	833078	833804	834577
819133	828545	831394	833084	833806	999705
819256	828577	831807	833120	833821	999712
819591	828580	832086	833128	833893	
819657	828715	832108	833146	833895	
819873	828812	832116	833174	833907	



# LENDER SERVICER AND AUDITOR INFORMATION SHEET

## Nelnet, Inc. Lincoln, Nebraska Year Ended December 31, 2023

### Servicer Information:

Lender ID Number(s): 700030 and 700121  
 Auditee Contact: Carrie Weber, Chief Audit Executive  
 Auditee Email: Carrie.weber@nelnet.net  
 Auditee Phone: (402) 657 - 7420

### Auditor Information:

Audit Firm: KPMG, LLP  
 Firm Address: 212 N. 96<sup>th</sup> Street, Suite 300  
 Firm City, State: Omaha, NE  
 Firm License Number: 58870  
 Primary Auditor: Liz Luckasen  
 Primary Email: eluckasen@kpmg.com  
 Primary Phone: (402) 438 - 1450

### LISTING OF LENDER CLIENTS

ID Number	Name of Lender	City	State
700204	GRANITE EDVANCE CORPORATION UNINSURED	CONCORD	NH
800061	TRUIST	RICHMOND	VA
805178	LPFA TRSTEE JP MORGAN TRST CO., NTL ASSO	BATON ROUGE	LA
808170	SIDNEY FEDERAL CREDIT UNION	SIDNEY	NY
808543	ASAP/UNION BANK & TRUST	LINCOLN	NE
808851	ACCESS GROUP	WEST CHESTER	PA
810436	GREAT WESTERN BANK	SIOUX FALLS	SD
810815	FIRST NATIONAL BANK OF TEXAS	KILLEEN	TX
811025	KEY BANK NA	BROOKLYN	OH
811303	TRUIST	RICHMOND	VA
811304	TRUIST	RICHMOND	VA
811911	FIRST NATIONAL BANK OF RIVER FALLS	RIVER FALLS	WI
812089	TEXAS HIGHER EDUCATION COOR. BOARD	AUSTIN	TX
813125	ALPENA ALCONA AREA CREDIT UNION	ALPENA	MI
813146	UNIVERSITY OF MICHIGAN CREDIT UNION	ANN ARBOR	MI
813574	CUMBERLAND COUNTY FEDERAL CREDIT UNION	FALMOUTH	ME
813760	KEY BANK NA	BROOKLYN	OH
814657	LOUISIANA CATHOLIC FEDERAL CREDIT UNI	SHREVEPORT	LA
815675	PALISADES FEDERAL CREDIT UNION	PEARL RIVER	NY
815901	LIBERTY FEDERAL CREDIT UNION	EVANSVILLE	IN
817517	CENTRA CREDIT UNION	COLUMBUS	IN
818505	BANK OF PRAIRIE DU SAC	PRAIRIE DU SAC	WI
818611	UNIV OF WISCONSIN CREDIT UNION	MADISON	WI
819129	BANK MUTUAL	MILWAUKEE	WI

<b>ID Number</b>	<b>Name of Lender</b>	<b>City</b>	<b>State</b>
819133	BLACK HILLS FEDERAL CREDIT UNION	RAPID CITY	SD
819256	FOX COMMUNITIES CREDIT UNION	APPLETON	WI
819591	CELCO FEDERAL CREDIT UNION	NARROWS	VA
819657	YOUR LEGACY FEDERAL CREDIT UNION	TIFFIN	OH
819873	TRUIST	RICHMOND	VA
819958	FARMERS SAVINGS BANK	MINERAL POINT	WI
820174	DUPONT COMMUNITY CREDIT UNION	WAYNESBORO	VA
820682	SAN ANTONIO FEDERAL CREDIT UNION	SAN ANTONIO	TX
820685	INDIANA UNIVERSITY CREDIT UNION	BLOOMINGTON	IN
820694	SACO VALLEY CREDIT UNION	SACO	ME
821013	FORT HOOD NATIONAL BANK	KILLEEN	TX
822051	SABATTUS REGIONAL CREDIT UNION	SABATTUS	ME
822218	TRI CITY NATIONAL BK	WEST ALLIS	WI
822440	BAY SHORE CREDIT UNION	MARINETTE	WI
822605	CES CREDIT UNION	MOUNT VERNON	OH
823247	BFG FEDERAL CREDIT UNION	AKRON	OH
823459	ROYAL CREDIT UNION	EAU CLAIRE	WI
824038	NEW YORK STATE CREDIT UNION	POUGHKEEPSIE	NY
824573	NELNET ACADEMIC LOAN	INDIANAPOLIS	IN
824945	MICHIGAN STATE UNIVERSITY	EAST LANSING	MI
825240	YS FEDERAL CREDIT UNION	YELLOW SPRINGS	OH
825585	MICHIGAN FINANCE AUTHORITY (MFA) SLP	LANSING	MI
826191	FIRST NEW YORK FEDERAL CREDIT UNION	ALBANY	NY
826509	ARKANSAS STUDENT LOAN AUTHORITY	LITTLE ROCK	AR
826584	SIMPLICITY CREDIT UNION	MARSHFIELD	WI
826910	COMMUNITY FIRST CREDIT UNION	APPLETON	WI
827104	EQUITABLE BANK, SSB	MILWAUKEE	WI
827656	LANDMARK CREDIT UNION	NEW BERLIN	WI
828416	UNITED FEDERAL CREDIT UNION	ST. JOSEPH	MI
828545	GREAT WESTERN BANK	SIOUX FALLS	SD
828577	RHODE ISLAND STUDENT LOAN AUTHORITY	WARWICK	RI
828580	GREAT MIDWEST BANK, SSB	BROOKFIELD	WI
828715	PREMIER FINANCIAL CREDIT UNION	NEW HOLSTEIN	WI
828812	FORWARD FINANCIAL CREDIT UNION	NIAGARA	WI
829077	WELLS FARGO FOR NAVIENT STUDENT LN TRUST	FISHERS	IN
829212	TEACHERS CREDIT UNION	BELOIT	WI
829293	MASS MUTUAL FEDERAL CREDIT UNION	SPRINGFIELD	MA
829324	STARK FEDERAL CREDIT UNION	CANTON	OH
829346	MEMBERS' ADVANTAGE CREDIT UNION	WISCONSIN RAPIDS	WI
829414	FOX COMMUNITIES CREDIT UNION	APPLETON	WI
829512	GPO FEDERAL CREDIT UNION	NEW HARTFORD	NY
829565	CREIGHTON FEDERAL CREDIT UNION	OMAHA	NE
829833	M-O FEDERAL CREDIT UNION	HURON	SD
829928	AFFINITY PLUS CREDIT UNION	ST PAUL	MN
830091	PATENT & TRADEMARK OFFICE FEDERAL CU	ALEXANDRIA	VA
830160	SC STUDENT LOAN CORP	COLUMBIA	SC
830241	CHRISTIAN COMMUNITY CREDIT UNION	COVINA	CA

<b>ID</b>			
<b>Number</b>	<b>Name of Lender</b>	<b>City</b>	<b>State</b>
830267	MIDWEST COMMUNITY FEDERAL CREDIT UNION	DEFIANCE	OH
830332	FOX COMMUNITIES CREDIT UNION	APPLETON	WI
830336	MN VALLEY FEDERAL CREDIT UNION	MANKATO	MN
830351	SC STUDENT LOAN CORP	COLUMBIA	SC
830370	EVERGREEN CREDIT UNION	NEENAH	WI
830492	ASSOCIATED BANC CORP	GREEN BAY	WI
830720	STEUBEN CITIZENS FEDERAL CREDIT UNION	BATH	NY
830772	STANFORD FEDERAL CREDIT UNION	PALO ALTO	CA
830922	SHEBOYGAN AREA CREDIT UNION	SHEBOYGAN	WI
830977	POLICE & FIRE FEDERAL CREDIT UNION	PHILADELPHIA	PA
831221	SC STUDENT LOAN CORP	COLUMBIA	SC
831394	OAKDALE CREDIT UNION	OAKDALE	WI
831807	SC STUDENT LOAN CORP	COLUMBIA	SC
832086	GENESEE CO-OP FEDERAL CREDIT UNION	ROCHESTER	NY
832108	KEMBA FINANCIAL CREDIT UNION	GAHANNA	OH
832116	FIREFIGHTERS COMMUNITY CREDIT UNION	CUYAHOGA HEIGHTS	OH
832124	ASSOCIATED SCHOOL EMPLOYEES CU	LORDSTOWN	OH
832139	KNOWLEDGEWORKS FOUNDATION	LINCOLN	NE
832218	PENOBSCOT COUNTY FEDERAL CREDIT UNION	OLD TOWN	ME
832275	UNIVERSITY OF MICHIGAN CREDIT UNION	ANN ARBOR	MI
832286	ACMG FEDERAL CREDIT UNION	SOLVAY	NY
832292	UNITED CREDIT UNION	MEXICO	MO
832336	CONSUMERS PROFESSIONAL CREDIT UNION	LANSING	MI
832347	GREATER TEXAS SERVICES	BRYAN	TX
832379	NORTHWEST HILLS CREDIT UNION	TORRINGTON	CT
832407	BUFFALO METROPOLITAN FCU	BUFFALO	NY
832438	WESTAR FEDERAL CREDIT UNION	CAMILLUS	NY
832463	HEALTH ROCKWELL EMPLOYEE FCU	HEATH	OH
832494	SYMPHONY FEDERAL CREDIT UNION	BOSTON	MA
832630	OUR COMMUNITY FEDERAL CREDIT UNION	SHELTON	WA
832637	TELHIO CREDIT UNION	COLUMBUS	OH
832848	FREEDOM COMMUNITY CREDIT UNION	FARGO	ND
832868	CENTRICITY CREDIT UNION	HERMANTOWN	MN
832892	SPOKANE FEDERAL CREDIT UNION	SPOKANE	WA
832897	COMPASS FEDERAL CREDIT UNION	FULTON	NY
832994	GRANITE EDVANCE CORPORATION	CONCORD	NH
833016	SC STUDENT LOAN CORP	COLUMBIA	SC
833017	SC STUDENT LOAN CORP	COLUMBIA	SC
833049	NEW HAMPSHIRE POSTAL CREDIT UNION	MANCHESTER	NH
833078	BRAZOS STUDENT FINANCE CORPORATION	WACO	TX
833084	CENTRICITY CREDIT UNION	HERMANTOWN	MN
833120	AREA COMMUNITY CREDIT UNION	GRAND FORKS	ND
833128	SC STUDENT LOAN CORP	COLUMBIA	SC
833146	GOLDEN RULE COMMUNITY CREDIT UNION	RIPON	WI
833174	M&T TRUST AS ELT FOR ALL 2013, LLC	EL SEGUNDO	CA
833193	SC STUDENT LOAN CORP	COLUMBIA	SC
833220	KEY CORP STUDENT LOAN TRUST	OVERLAND PARK	KS

<b>ID</b>			
<b>Number</b>	<b>Name of Lender</b>	<b>City</b>	<b>State</b>
833253	NAVIENT EDUCATION TRUST	FISHERS	IN
833307	SC STUDENT LOAN CORP	COLUMBIA	SC
833358	TWO HARBORS FEDERAL CREDIT UNION	TWO HARBORS	MN
833405	STUDENT LOAN FINANCE CORPORATION	ABERDEEN	SD
833456	NHELP-II, LLC	LINCOLN	NE
833500	NELNET EDUCATION LOAN FUNDING, INC.	LINCOLN	NE
833528	SELF-HELP FEDERAL CREDIT UNION	VELLEJO	CA
833529	T.H.E. LOAN PROGRAM	EAGAN	MN
833555	LIBERT FIRST CREDIT UNION	LINCOLN	NE
833570	ACCESS GROUP INC	WILMINGTON	DE
833596	MARATHON COUNTY EMPLOYEES CREDIT UNION	WAUSAU	WI
833637	NORTHERN COMMUNITIES CREDIT UNION	DULUTH	MN
833668	SC STUDENT LOAN CORP	COLUMBIA	SC
833669	NELNET ACADEMIC LOAN	LINCOLN	NE
833670	NHELP-III, INC.	LINCOLN	NE
833733	COLLEGE LOAN CORPORATION	LAS VEGAS	NV
833751	M&T TRUST AS ELT FOR ALL 2012, LLC	HARRISBURG	PA
833752	M&T TRUST AS ELT FOR ALL 2010, LLC	HARRISBURG	PA
833760	OKLAHOMA CENTRAL CREDIT UNION	TULSA	OK
833764	DEXSTA FEDERAL CREDIT UNION	WILMINGTON	DE
833770	FEDERATED STUDENT FINANCE CORPORATION	WACO	TX
833804	KEY BANK NA	BROOKLYN	OH
833806	USBANK TRUSTEE FOR BRAZOS HEA	WACO	TX
833821	UNION BANK AS TRUSTEE FOR HRB RETAIL	LINCOLN	NE
833893	FRANDSEN BANK & TRUST	LAKEVILLE	MN
833895	NELNET MGT CORP-1 AND AFFILIATES	LINCOLN	NE
833907	NELNET STUDENT LOAN FUNDING	LINCOLN	NE
833923	COLLEGE LOAN CORP/BNY ELT	LAS VEGAS	NV
833924	EDGE FEDERAL CREDIT UNION	LIVERPOOL	NY
833934	NELNET STUDENT LOAN TRUST	LINCOLN	NE
833955	GCO ED LOAN FUND MSTR TRST-II	LINCOLN	NE
834006	KEY BANK NA	BROOKLYN	OH
834071	NAVIENT EDUCATION FINANCE CORP	LINCOLN	NE
834076	PCG ALG C/O NIMBUS ONE	SAN DIEGO	CA
834097	NORTH TEXAS HIGHER EDUCATION AUTHORITY	ARLINGTON	TX
834119	GOAL FINANCIAL, LLC	SAN DIEGO	CA
834202	NELNET ACADEMIC LOAN	INDIANAPOLIS	IN
834223	WACHOVIA EDUCATION LOAN FUNDING, LLC	LINCOLN	NE
834336	ZIONS FIRST NATIONAL BANK AS ELT ED LOAN	DENVER	CO
834409	BRAZOS EDUCATION LOAN AUTHORITY	WACO	TX
834416	US BANK ELT FOR BARCLAYS BANK PLC	LINCOLN	NE
834453	SC STUDENT LOAN CORP	COLUMBIA	SC
834455	M&T TRUST COMPANY ELT ECMC GROUP	MINNEAPOLIS	MN
834469	SC STUDENT LOAN CORP	COLUMBIA	SC
834477	SC STUDENT LOAN CORP	COLUMBIA	SC
834508	SC STUDENT LOAN CORP	COLUMBIA	SC
834543	UNION BANK/TRUST (ELT) FHLB	LINCOLN	NE

ID			
Number	Name of Lender	City	State
834544	NORTH TEXAS HIGHER EDUCATION AUTHORITY	ARLINGTON	TX
834550	SLFC WELLS FARGO AS ELT	ABERDEEN	SD
834576	NELNET BANK	DRAPER	UT
834577	NORTH TEXAS HIGHER EDUCATION AUTHORITY	ARLINGTON	TX
999705	COLLEGE ACCESS NETWORK - LOAN SERVICING	DENVER	CO
999712	ILLINOIS OPPORTUNITY LOAN PROGRAM	DEERFIELD	IL

*Representation of:*  
Higher Education Servicing Corporation  
4381 W Green Oaks Blvd Ste 200  
Arlington, Texas 76016

*Provided to:*  
**FORVIS, LLP**  
Certified Public Accountants  
777 Main Street, Suite 2000  
Fort Worth, Texas 76102

The undersigned ("We") are providing this letter in connection with FORVIS' examination of our written assertion about Higher Education Servicing Corporation's (HESC) compliance with the U.S. Department of Education's Office of the Inspector General (ED/OIG) *2020 Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans (Guide)* as of and for the year ended August 31, 2023.

Our representations are current and effective as of the date of FORVIS' report: March 5, 2024.

Our engagement with FORVIS is based on our contract for services dated: August 1, 2023.

### **Confirmation of Matters Specific to the Subject Matter of FORVIS' Report**

We confirm, to the best of our knowledge and belief, the following:

1. We make the following assertions: We are responsible for complying with U.S. Department of Education requirements relating to participation in the Federal Family Education Loan Program.
  - a. HESC complied with all criteria effective during the attestation period, as appropriate, for the Interest Benefits and Special Allowance Payments attestation objectives included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.
  - b. HESC complied with all criteria effective during the attestation period, as appropriate, for the Loan Records and Administration attestation objectives included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*, including those related to Loan Records; Student Status; and Loan Sales, Purchases, and Transfers.
  - c. HESC complied with all criteria effective during the attestation period, as appropriate, for the Payment Processing attestation objectives included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.
  - d. HESC complied with all criteria effective during the attestation period, as appropriate, for the Due Diligence, Timely Claim Filing, and Curing Violations attestation objective included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.
2. All relevant matters are reflected in the evaluation of the assertion.
3. All known matters contradicting the assertion and any communication from regulatory agencies or others affecting the assertion have been disclosed to you, including any communications received between the end of the period addressed in the written assertion and the date of your report.

4. We are responsible for the assertions.
5. We are responsible for the selection of suitable criteria and determining that such criteria are appropriate for our purposes.
6. We have provided you with all relevant information and access.
7. We have disclosed to you all known matters that would materially affect the assertions.
8. We have disclosed to you all known events subsequent to the period of the subject matter being reported on that would have a material effect on the assertion.
9. With regard to compliance, we acknowledge the following:
  - a. We are responsible for establishing and maintaining effective internal control over compliance.
  - b. We have performed an evaluation of compliance with the specified requirements.
10. We acknowledge our responsibility for the design and implementation of programs and controls to prevent and detect fraud.
11. We have no knowledge of any known or suspected fraudulent financial reporting or misappropriation of assets involving:
  - a. Management or employees who have significant roles in internal control, or
  - b. Others, where activities of others could have a material effect on the subject matter.
12. We have no knowledge of any allegations of fraud or suspected fraud affecting the subject matter received in communications from employees, customers, regulators, suppliers, or others.
13. We have disclosed to you all known instances of noncompliance or suspected noncompliance with laws and regulations affecting the subject matter.
14. We have disclosed to you all deficiencies in internal control relevant to the subject matter of which we are aware.
15. We have responded fully and truthfully to all your inquiries.

Phillip Wambsganss  
Phillip Wambsganss (Mar 5, 2024 16:13 CST)  
Phillip Wambsganss, Executive Director

Denise Dunn-Trakshel  
Denise Dunn-Trakshel, Controller



**Higher Education  
Servicing Corporation, Inc.  
Arlington, Texas**

**Lender IDs:**

**834097**

**834544**

**831606**

**805149**

**805178**

**Standard Compliance Attestation Engagement  
of the Federal Family Education Loan  
Program – Independent Accountant's Report**

**For the Year Ended August 31, 2023**





# Higher Education Servicing Corporation, Inc.

August 31, 2023

## Contents

Independent Accountants' Report .....	1
Management's Assertions .....	2
Schedule of Findings and Questioned Costs .....	3
Summary Schedule of Prior Findings .....	4

## Attachments

Background.....	5
Lender Servicer, Listing of Lender IDs, and Auditor Information Sheet .....	6



14241 Dallas Parkway, Suite 1100 / Dallas, TX 75254

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[forvis.com](http://forvis.com)

## Independent Accountants' Report

Board of Directors  
Higher Education Servicing Corporation, Inc.  
Arlington, Texas

We have examined management of Higher Education Servicing Corporation, Inc.'s (HESC)'s assertions that HESC complied with the compliance requirements regarding Interest Benefits and Special Allowance Payments; Loan Records and Administration; Payment Processing; and Due Diligence, Timely Claim Filing, and Curing Violations described in Chapter 2 of the 2020 edition of the U. S. Department of Education's *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans* (Guide) relative to HESC's participation in the Federal Family Education Loan (FFEL) program, for the year ended August 31, 2023. HESC's management is responsible for its assertions. Our responsibility is to express an opinion on management's assertions about HESC's compliance with the compliance requirements referred to above based on our examination.

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

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on the HESC's compliance with the specified compliance requirements referred to above.

In our opinion, management's assertions that Higher Education Servicing Corporation complied with the compliance requirements referred to above for the year ended August 31, 2023, is fairly stated, in all material respects.

The purpose of this report is to evaluate compliance with the compliance requirements referred to above relative to HESC's participation in the FFEL program, for the year ended August 31, 2023. The report is not suitable for any other purpose.

**FORVIS, LLP**

Dallas, Texas  
March 5, 2024

## Management's Assertions

HESC complied with all criteria effective during the attestation period, as appropriate, for the Interest Benefits and Special Allowance Payments attestation objectives included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.

HESC complied with all criteria effective during the attestation period, as appropriate, for the Loan Records and Administration attestation objectives included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*, including those related to Loan Records; Student Status; and Loan Sales, Purchases, and Transfers.

HESC complied with all criteria effective during the attestation period, as appropriate, for the Payment Processing attestation objectives included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.

HESC complied with all criteria effective during the attestation period, as appropriate, for the Due Diligence, Timely Claim Filing, and Curing Violations attestation objective included in Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.

**Higher Education Servicing Corporation, Inc.**  
**Schedule of Findings and Questioned Costs**  
**For the Year Ended August 31, 2023**

No matters are reportable.

**Higher Education Servicing Corporation, Inc.**  
**Summary Schedule of Prior Findings**  
**For the Year Ended August 31, 2023**

No matters are reportable.

## Attachment 1

### Background

Section 428(b)(1)(U) of the Higher Education Act of 1965 (HEA), as amended, requires servicer organizations to obtain an annual service compliance audit unless the servicer contracts with only one lender and the audit of that lender's FFEL program involves every aspect of the servicer's administration of that FFEL program. The HEA requires that these audits be performed in accordance with standards applicable to attestation engagements contained in The U.S. General Accounting Office's (GAO) *Government Auditing Standards*, issued by the Comptroller General of the United States. The regulations implementing the audit requirement (34 CFR 682.305(c)) specify that procedures for conducting the audit are available in a guide developed by the Department of Education's (ED) Office of the Inspector General, *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans* (Guide).

Higher Education Servicing Corporation (HESC) is a third-party student loan servicer responsible for the proper and timely performance of many aspects of loan processing. These services are provided on behalf of the organizations that hold student loans which choose not to perform the required activities themselves. The primary functions of HESC and its Servicing System (the System) are:

- Receipt and processing of borrower inquiries, both received in writing and via telephone, receipt and processing of all borrower correspondence, deferment and forbearance requests, graduation date changes, and repayment plan changes, including Income-Based Repayments;
- Receipt and maintenance of loan documents received in either original hard copy format, electronic microfilm or imaged copies;
- Management of student loans based on the borrower status, including the billing of accrued interest to the appropriate party;
- Billing and processing of payments on loans; and
- Maintenance of borrower account histories, showing relevant activity on the account, including due diligence procedures, as required by federal regulations and guarantor policies for claim payment on defaulted loans.

The primary functions described above allow HESC to prepare billing information for the quarterly *Lenders Interest and Special Allowance Request and Reports* ("LaRS") and submit this information directly to ED. Because HESC's service to its lender clients is limited to the preparation of the LaRS, HESC's lender clients are responsible for payments to ED for any loan origination fees and/or excess interest rebates that may exceed the interest and/or special allowance payments due from ED.

On page 2 are the assertions made to FORVIS, LLP by HESC's management regarding our preparation of information for the LaRS. As noted earlier, these assertions are in compliance with requirements of Chapter 2, Section C of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans*.

**Attachment 2**

**Lender Servicer, Listing of Lender IDs, and Auditor Information Sheet  
August 31, 2023**

<b><u>Lender Servicer Information:</u></b>	
Lender Servicer Name:	Higher Education Servicing Corporation
Lender Servicer ID Number(s):	700064
Telephone Number:	(817) 265-9158
Fax Number (Gen Acct):	(817) 792-7865
Executive Director:	Mr. Phillip Wambsganss
Name of Contact Person and Title:	Mr. Phil Kinman, Director Policy and Compliance

<b><u>Lender Number</u></b>	<b><u>Lender Name</u></b>
834097	North Texas Higher Education Authority
834544	North Texas Higher Education Authority
831606	First Convenience Bank
805149	Louisiana Education Loan Authority
805178	Louisiana Education Loan Authority

<b><u>Audit Firm Information:</u></b>	
Audit Firm	<b>FORVIS LLP</b>
Firm Address	910 E St. Louis St, Suite 400
Firm City, State	Springfield, Missouri
Firm License Number – Principal Office	2022021035
Firm License Number – Texas	P05029
Primary Auditor	Sara Grenier
Primary Email	Sara.Grenier@FORVIS.com
Primary Phone	(817) 332-2301

**Patricia A. Dubroc**  
President and CEO

**Martin Walke**  
Vice President



Board of Trustees

**Ronald H. Bordelon**, Chairman  
**Dannye W. Malone**, Vice Chairman  
**Craig A. Cheramie**  
**David W. Groner**  
**Casey R. Guidry**  
**Matthew T. Valliere**  
**Heather C. Songy**

June 20, 2024

EisnerAmper LLP  
 8550 United Plaza Blvd, Suite 1001  
 Baton Rouge, LA 70809

Ladies and Gentlemen:

In connection with your engagement to apply agreed-upon procedures to our assertions about Louisiana Public Facilities Authority's compliance with certain U.S. Department of Education requirements relating to Louisiana Public Facilities Authority's 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's participation in the Federal Family Education Loan (FFEL) Program during the year ended December 31, 2023, we confirm, to the best of our knowledge and belief, the following representations made to you during your engagement:

1. We are responsible for complying with U.S. Department of Education requirements relating to participation in the Federal Family Education Loan Program and for our assertions about such compliance.
2. We are responsible for establishing and maintaining effective internal control over compliance with the specified compliance requirements.
3. We acknowledge responsibility for
  - i. The subject matter and the assertions below:
    - a. Providing all lender service contracts
    - b. Providing all lender servicer engagement reports
    - c. There are no other compliance requirements, other than those noted above, with the Federal Family Education Loan Program that require consideration
  - ii. Selecting the criteria, when applicable; and
  - iii. Determining that such criteria are appropriate for the responsible party's purposes.
4. We have provided you with all relevant information and access under the terms of our agreement.
5. We have performed an evaluation of the Louisiana Public Facilities Authority 2011A Taxable Student Loan Backed Bond Program and Super Top Trust Origination Program's compliance with the specified compliance requirements.
6. We make the following assertions:
  - a. The Nelnet Loan Services and Educational Services of America, Inc. d/b/a EdFinancial Services. compliance audit or attestation engagement report(s) meet the requirements described in Chapter 3, Section C.1, of the *Guide for Compliance Attestation Engagements of Lenders Holding Federal Family Education Loan Program Loans* to be used as a basis for an alternative or combined engagement.



**Patricia A. Dubroc**  
President and CEO

**Martin Walke**  
Vice President



Board of Trustees

**Ronald H. Bordelon**, Chairman

**Dannye W. Malone**, Vice Chairman

**Craig A. Cheramie**

**David W. Groner**

**Casey R. Guidry**

**Matthew T. Valliere**

**Heather C. Songy**

- b. All instances of noncompliance reported in the Nelnet Loan Services and Educational Services of America, Inc. d/b/a EdFinancial Services Compliance audit or attestation engagement report(s) that relate to a FFEL Program compliance functions for which LPFA has contracted Nelnet Loan Services and Educational Services of America, Inc. d/b/a EdFinancial Services to perform have been disclosed to the auditor for inclusion in the lender compliance attestation engagement report by reference.
7. The lender IDs covered by the preceding assertions are 805178 and 805149.
  8. We have disclosed to you all known matters that may contradict our assertions.
  9. We have disclosed to you all communications from regulatory agencies, internal auditors, guaranty agencies, other independent accountants or consultants, and others regarding compliance with the specified requirements and the resolution of any reported findings in any report within the fiscal year prior to the engagement period. We have also disclosed to you communications received between the end of the compliance period, December 31, 2023, and the date of your report, June 20, 2024.
  10. We are not aware of any noncompliance with the specified requirements.
  11. We have disclosed to you all known events subsequent to the date of the compliance period, December 31, 2023, to the date of this letter and the date of your report, June 20, 2024, that would have a material effect on our compliance with requirements.
  12. We have made available all agreements, documents, and electronic files pertinent to the scope of the engagement.
  13. For the preceding five years Louisiana Public Facilities Authority has not been limited, suspended, or terminated by ED nor has Louisiana Public Facilities Authority been cited for failure to submit required audits/attestation engagements.
  14. The LaRS we provided to you are copies of the forms submitted to the U.S. Department of Education. These forms were prepared by Nelnet Loan Services, Educational Services of America, Inc. d/b/a EdFinancial Services and Higher Education Servicing Corporation.
  15. Your report is intended solely for the information and use of the board of trustees, management and the U.S. Department of Education and Program related parties and is not intended to be and should not be used by anyone other than these specified parties.

Signature:

*Patricia A. Dubroc*

Signature:

*Amy Tuminello*

Title:

President and CEO

Title:

Accountant

Date:

6-20-24

Date:

6/20/2024

Signature:

*Martin Walke*

Title

VicePresident

Date

6/20/2024