



FINANCIAL SECTION

ABOUT THE FINANCIAL SECTION

In FY 2018, the Department prepared its financial statements as a critical aspect of ensuring accountability and stewardship for the public resources entrusted to it. Preparation of these statements is an important part of the Department's financial management goal of providing accurate and reliable information for decision making.

FINANCIAL STATEMENTS AND NOTES

The **Consolidated Balance Sheets** summarize the assets, liabilities, and net position by major category as of the reporting date. Intragovernmental assets and liabilities resulting from transactions between federal agencies are presented separately from assets and liabilities from transactions with the public.

The **Consolidated Statements of Net Cost** show, by strategic goal, the net cost of operations for the reporting period. Net cost of operations consists of full program costs incurred by the Department less exchange revenues earned by those programs.

The **Consolidated Statements of Changes in Net Position** present the Department's beginning and ending net position by two components—Cumulative Results of Operations and Unexpended Appropriations. It summarizes the change in net position by major transaction category. The ending balances of both components of the net position are also reported on the Consolidated Balance Sheets.

The **Combined Statements of Budgetary Resources** present the budgetary resources available to the Department, the status of these resources, and the outlays of budgetary resources.

The **Notes to the Financial Statements** provide information to explain the basis of the accounting and presentation used to prepare the statements and to explain specific items in the statements. They also provide information to support how particular accounts have been valued and computed.

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REQUIRED SUPPLEMENTARY INFORMATION (UNAUDITED)

This section contains the Combining Statements of Budgetary Resources for the Years Ended September 30, 2018, and September 30, 2017.

REQUIRED SUPPLEMENTARY STEWARDSHIP INFORMATION (UNAUDITED)

Stewardship Expenses summarize spending and stakeholder relationships with state and local educational agencies. Stewardship resources are substantial investments by the federal government for the long-term benefit of the nation. Since costs of stewardship resources are treated as expenses in the financial statements in the year the costs are incurred, they are reported as Required Supplementary Stewardship Information to highlight the benefit nature of the costs and to demonstrate accountability.

Supplementing state and local government funding, the Department utilizes its annual appropriations and outlay authority to foster human capital improvements

across the nation by supporting programs along the entire spectrum of “cradle to career” education. Increased employability makes Americans more competitive in the global labor market, yielding lower unemployment, higher economic well-being, and greater security for the nation.

REPORT OF THE INDEPENDENT AUDITORS

The results of the audit of the Department’s financial statements for FY 2018 and FY 2017 to comply with the *Chief Financial Officers Act of 1990*, as amended, are presented to be read in conjunction with the Financial Section in its entirety. The Department’s Office of Inspector General (OIG) contracted with the independent certified public accounting firm of KPMG LLP to audit the financial statements of the Department as of September 30, 2018, and for the year then ended. OIG contracted with the independent certified public accounting firm of CliftonLarsonAllen LLP to audit the financial statements of the Department as of September 30, 2017, and for the year then ended.

United States Department of Education
Consolidated Balance Sheets
As of September 30, 2018 and September 30, 2017
(Dollars in Millions)

	FY 2018		FY 2017	
ASSETS				
Intragovernmental:				
Fund Balance with Treasury (Note 3)	\$	114,605	\$	110,174
Other Intragovernmental Assets (Note 4)		151		65
Total Intragovernmental		114,756		110,239
Public:				
Credit Program Receivables, Net (Note 5)				
Direct Loan Program		1,115,053		1,041,554
FFEL Program		92,947		102,410
Other Credit Programs for Higher Education		2,849		2,755
Other Assets (Note 4)		2,377		2,285
Total Public		1,213,226		1,149,004
Total Assets (Note 2)	\$	1,327,982	\$	1,259,243
LIABILITIES				
Intragovernmental:				
Debt (Note 7)				
Direct Loan Program	\$	1,150,610	\$	1,061,559
FFEL Program		107,261		116,290
Other Credit Programs for Higher Education		2,094		2,222
Subsidy Due to Treasury General Fund (Note 8)		7,536		7,013
Other Intragovernmental Liabilities (Note 9)		2,765		2,633
Total Intragovernmental		1,270,266		1,189,717
Public:				
Other Liabilities (Note 9)		8,910		12,366
Total Liabilities (Note 6)	\$	1,279,176	\$	1,202,083
Commitments and Contingencies (Note 13)				
NET POSITION				
Unexpended Appropriations	\$	72,166	\$	62,399
Cumulative Results of Operations		(23,360)		(5,239)
Total Net Position	\$	48,806	\$	57,160
Total Liabilities and Net Position	\$	1,327,982	\$	1,259,243

The accompanying notes are an integral part of these statements.

United States Department of Education
Consolidated Statement of Net Cost
For the Year Ended September 30, 2018
(Dollars in Millions)

	FY 2018
PROGRAM COSTS	
Improve Learning Outcomes for all P-12 Students	
Gross Costs	\$ 37,277
Earned Revenue	(82)
Net Program Costs	\$ 37,195
Expand Postsecondary Opportunities, Improve Outcomes to Foster Economic Opportunity, and Promote Productive Citizenry	
<u>Direct Loan Program</u>	
Gross Costs	\$ 37,965
Earned Revenue	(32,329)
Net Cost of Direct Loan Program	\$ 5,636
<u>FFEL Program</u>	
Gross Costs	\$ 4,599
Earned Revenue	(3,336)
Net Cost of FFEL Program	\$ 1,263
<u>Other Credit Programs for Higher Education</u>	
Gross Costs	\$ 298
Earned Revenue	(621)
Net Cost of Other Credit Programs for Higher Education	\$ (323)
<u>Non-Credit Programs</u>	
Gross Costs	\$ 35,764
Earned Revenue	(10)
Net Cost for Non-Credit Programs	\$ 35,754
Net Program Costs	\$ 42,330
Total Gross Cost	\$ 115,903
Total Earned Revenue	\$ (36,378)
Net Cost of Operations (Notes 10 & 12)	\$ 79,525

The accompanying notes are an integral part of these statements.

**United States Department of Education
Consolidated Statement of Net Cost
For the Year Ended September 30, 2017
(Dollars in Millions)**

	FY 2017
PROGRAM COSTS	
Increase College Access, Quality, and Completion	
Gross Costs	\$ 78,289
Earned Revenue	(35,887)
Net Program Costs	<u>\$ 42,402</u>
Improve Preparation for College and Career from Birth Through 12th Grade, Especially for Children with High Needs	
Gross Costs	\$ 22,577
Earned Revenue	(10)
Net Program Costs	<u>\$ 22,567</u>
Ensure Effective Educational Opportunities for All Students	
Gross Costs	\$ 17,258
Earned Revenue	(11)
Net Program Costs	<u>\$ 17,247</u>
Enhance the Education System's Ability to Continuously Improve	
Gross Costs	\$ 2,122
Earned Revenue	(59)
Net Program Costs	<u>\$ 2,063</u>
Total Program Cost	\$ 120,246
Total Program Revenue	\$ (35,967)
Net Cost of Operations (Notes 10 & 12)	<u>\$ 84,279</u>

The accompanying notes are an integral part of these statements.

United States Department of Education
Consolidated Statements of Changes in Net Position
For the Years Ended September 30, 2018 and September 30, 2017
(Dollars in Millions)

	FY 2018		FY 2017	
	Unexpended Appropriations	Cumulative Results of Operations	Unexpended Appropriations	Cumulative Results of Operations
Beginning Balances	\$ 62,399	\$ (5,239)	\$ 61,052	\$ (28,215)
Budgetary Financing Sources				
Appropriations Received	\$ 100,743	\$ -	\$ 135,945	\$ -
Appropriations Transferred In/Out	-	-	1	-
Other Adjustments (Rescissions, etc.)	(1,824)	-	(1,910)	-
Appropriations Used	(89,152)	89,152	(132,689)	132,689
Nonexchange Revenue	-	(3)	-	-
Other Financing Sources				
Imputed Financing from Costs Absorbed by Others	-	39	-	27
Negative Subsidy Transfers, Downward Subsidy				
Re-estimates, and Other	-	(27,784)	-	(25,461)
Total Financing Sources	\$ 9,767	\$ 61,404	\$ 1,347	\$ 107,255
NET COST OF OPERATIONS	\$ -	\$ (79,525)	\$ -	\$ (84,279)
NET CHANGE	\$ 9,767	\$ (18,121)	\$ 1,347	\$ 22,976
NET POSITION	\$ 72,166	\$ (23,360)	\$ 62,399	\$ (5,239)

The accompanying notes are an integral part of these statements.

**United States Department of Education
 Combined Statements of Budgetary Resources
 For the Years Ended September 30, 2018 and September 30, 2017
 (Dollars in Millions)**

	FY 2018		FY 2017	
	Budgetary	Non-Budgetary Credit Reform Financing Accounts	Budgetary	Non-Budgetary Credit Reform Financing Accounts
BUDGETARY RESOURCES				
Unobligated Balance from Prior Year Budget Authority (Net)	\$ 13,286	\$ 15,863	\$ 16,717	\$ 10,558
Appropriations (Discretionary and Mandatory)	99,341	-	134,388	-
Borrowing Authority (Discretionary and Mandatory) (Note 11)	-	167,897	-	166,601
Spending Authority from Offsetting Collections (Discretionary and Mandatory)	451	61,666	1,096	69,169
Total Budgetary Resources	\$ 113,078	\$ 245,426	\$ 152,201	\$ 246,328
Memorandum (non-add) entries:				
Net adjustments to unobligated balance brought forward, Oct. 1	\$ 1,008	\$ (7,350)	\$ 4,325	\$ (4,921)
STATUS OF BUDGETARY RESOURCES				
New Obligations Incurred and Upward Adjustments (Total) (Note 11)	\$ 95,228	\$ 221,698	\$ 139,923	\$ 223,115
Unobligated Balance, End of Year:				
Apportioned, Unexpired Accounts	14,495	-	9,012	-
Unapportioned, Unexpired Accounts	2,174	23,728	2,100	23,213
Unexpired Unobligated Balance, End of Year	\$ 16,669	\$ 23,728	\$ 11,112	\$ 23,213
Expired Unobligated Balance, End of Year	1,181	-	1,166	-
Unobligated Balance, End of Year (Total)	\$ 17,850	\$ 23,728	\$ 12,278	\$ 23,213
Total Status of Budgetary Resources	\$ 113,078	\$ 245,426	\$ 152,201	\$ 246,328
OUTLAYS, NET				
Outlays, Net (Discretionary and Mandatory)	\$ 91,080	\$ 83,100	\$ 131,274	\$ 40,460
Distributed Offsetting Receipts (-) (Note 11)	(27,370)	-	(19,562)	-
Agency Outlays, Net (Discretionary and Mandatory) (Note 11)	\$ 63,710	\$ 83,100	\$ 111,712	\$ 40,460

The accompanying notes are an integral part of these statements.

NOTES TO THE FINANCIAL STATEMENTS FOR THE PERIODS ENDED SEPTEMBER 30, 2018 AND 2017

NOTE 1. Summary of Significant Accounting Policies

REPORTING ENTITY AND PROGRAMS

The U.S. Department of Education (the Department), a cabinet-level agency of the executive branch of the U.S. government, was established by Congress under the *Department of Education Organization Act* (Public Law 96-88), which became effective on May 4, 1980. The mission of the Department is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

The Department is primarily responsible for administering federal student loan and grant programs and provides technical assistance to loan and grant recipients and other state and local partners. The largest portions of the Department's financial activities relate to the execution of loan and grant programs which are discussed below.

Federal Student Loan Programs. The Department administers direct loan, loan guarantee, and other student aid programs to help students and their families finance the cost of postsecondary education. These include the William D. Ford Federal Direct Loan (Direct Loan) program and the Federal Family Education Loan (FFEL) program.

The Direct Loan program, added to the *Higher Education Act of 1965* (HEA) in 1993 by the *Student Loan Reform Act of 1993*, authorizes the Department to make loans through participating schools to eligible undergraduate and graduate students and their parents. The Direct Loan program offers four types of loans: Stafford, Unsubsidized Stafford, PLUS, and Consolidation. Evidence of financial need is required for an undergraduate student to receive a subsidized Stafford loan. The other three loan programs are available to borrowers at all income levels. Loans can be used only to meet qualified educational expenses.

The FFEL program, authorized by the HEA, operates through state and private nonprofit guaranty agencies

that provide loan guarantees on loans made by private lenders to eligible students. The *Student Aid and Fiscal Responsibility Act* (SAFRA), which was included in the *Health Care and Education Reconciliation Act of 2010* (HCERA), stated that no new FFEL loans would be made effective July 1, 2010. FFEL program receivables include defaulted FFEL loans and acquired FFEL loans. Acquired FFEL loans include interest in student loan assets acquired using temporary authority provided in the *Ensuring Continued Access to Student Loans Act of 2008* (ECASLA). ECASLA gave the Department temporary authority to purchase FFEL loans and participation interests in those loans. The Department implemented three activities under this authority: loan purchase commitments; purchases of loan participation interests; and a put, or forward purchase commitment, with an Asset-Backed Commercial Paper (ABCP) Conduit. This authority expired after September 30, 2010; as a result, loan purchase commitments and purchases of loan participation interests concluded. However, under the terms of the Put Agreement with the conduit, ABCP Conduit activity ceased operations in January 2014.

The Department also administers other credit programs for higher education. These include the Federal Perkins Loan program, the Teacher Education Assistance for College and Higher Education Grant (TEACH) program, the Health Education Assistance Loan (HEAL) program, and facilities loan programs that includes the Historically Black Colleges and Universities (HBCU) Capital Financing program, along with low-interest loans to institutions of higher education for the building and renovating of their facilities. (See Notes 5 and 10)

Grant Programs. The Department has more than 100 grant programs. The three largest grant programs are Title I of the *Elementary and Secondary Education Act* (ESEA), Federal Pell Grant (Pell Grant), and the *Individuals with Disabilities Education Act* (IDEA) grants. In addition, the Department offers other discretionary grants under a variety of authorizing legislation awarded using a competitive process, and formula grants using formulas determined by Congress with no application process. (See Note 10)

PROGRAM OFFICES

The Department has three major program offices that administer most of its loan and grant programs:

- Federal Student Aid (FSA) administers financial assistance programs for students pursuing postsecondary education and makes available federal grants, direct loans, and work-study funding to eligible undergraduate and graduate students.
- The Office of Elementary and Secondary Education (OESE) assists state and local educational agencies to improve the achievement of preschool, elementary, and secondary school students, helps ensure equal access to services leading to such improvement—particularly children with high needs, and provides financial assistance to local educational agencies whose local revenues are affected by federal activities.
- The Office of Special Education and Rehabilitative Services (OSERS) supports programs that help provide early intervention and special education services to children and youth with disabilities. OSERS also supports programs for the vocational rehabilitation of youth and adults with disabilities, including preemployment transition services and other transition services designed to assist students with disabilities to enter postsecondary education and achieve employment.

Other offices that administer programs and provide leadership, technical assistance, and financial support to state and local educational activities and institutions of higher education for reform, strategic investment, and innovation in education include: the Office of Career, Technical, and Adult Education (OCTAE); Office of Postsecondary Education (OPE); Institute of Education Sciences (IES); Office of English Language Acquisition (OELA); and Office of Innovation and Improvement (OII). In addition, the Office for Civil Rights (OCR) works to ensure equal access to education, promotes educational excellence throughout the nation, and serves student populations facing discrimination and the advocates and institutions promoting systemic solutions to civil rights issues. (See Note 10)

BASIS OF ACCOUNTING AND PRESENTATION

These financial statements were prepared to report the financial position, net cost of operations, changes in net position, and budgetary resources of the Department, as

required by the *Chief Financial Officers Act of 1990* and the *Government Management Reform Act of 1994*. The financial statements were prepared from the books and records of the Department, in accordance with Generally Accepted Accounting Principles (GAAP) accepted in the U.S. for federal entities, issued by the Federal Accounting Standards Advisory Board (FASAB), and the Office of Management and Budget (OMB) Circular A-136, *Financial Reporting Requirements*, as revised. These financial statements are different from the financial reports prepared by the Department pursuant to OMB directives that are used to monitor and control the use of budgetary resources. FSA also issues audited stand-alone financial statements which are included in their annual report.

The Department's financial statements should be read as a component of the U.S. government, a sovereign entity. One of the many implications of this is that the liabilities cannot be liquidated without legislation providing resources and legal authority to do so.

The accounting structure of federal agencies is designed to reflect both accrual and budgetary accounting transactions. Under the accrual method of accounting, revenues are recognized when earned and expenses are recognized when a liability is incurred, without regard to receipt or payment of cash. Budgetary accounting facilitates compliance with legal constraints and controls over the use of federal funds.

Intradepartmental transactions and balances have been eliminated from the consolidated financial statements.

ACCOUNTING FOR FEDERAL CREDIT PROGRAMS

The Department's accounting for its loan and loan guarantee programs is based on the requirements of the *Federal Credit Reform Act of 1990* (FCRA). The purpose of the FCRA is to record the lifetime subsidy cost of direct loans and loan guarantees, in present value terms, at the time the loan is disbursed (subsidy). Components of subsidy costs for loans and guarantees include defaults (net of recoveries); contractual payments to third-party private loan collectors who receive a set percentage of amounts collected; and, as an offset, origination and other fees collected. For direct loans, the difference between interest rates incurred by the Department on its borrowings from Treasury and interest rates charged to particular borrowers is also subsidized (or may provide an offset to subsidy if the Department's rate is less).

Under the FCRA, subsidy cost is estimated using the net present value of future cash flows to and from the Department. In accordance with the FCRA, credit programs either estimate a subsidy cost to the government (a “positive” subsidy), breakeven (zero subsidy cost), or estimate a negative subsidy cost. Negative subsidy occurs when the estimated cost of providing loans to borrowers from Treasury borrowing, collection costs, and loan forgiveness is less than the value of collections from borrowers for interest and fees, in present value terms.

The subsidy costs of direct loan and loan guarantee programs are budgeted and tracked by the fiscal year in which the loan award is made or the funds committed. Such a grouping of loans or guarantees is referred to as a “cohort.” A cohort is a grouping of direct loans obligated or loan guarantees committed by a program in the same year even if disbursements occur in subsequent years.

In order to account for the change in the net present value of the loan portfolio over time, the subsidy cost is “amortized” each year. Amortization accounts for the differences in interest rates, accruals, and cash flows over the life of a cohort, ensuring that cost is reflected in subsidy estimates and re-estimates. Amortization of subsidy is calculated as the difference between interest received from borrowers and Treasury (on uninvested funds) and interest paid to Treasury on borrowings.

The FCRA establishes the use of financing, program, and Treasury General Fund receipt accounts for loan guarantees committed and direct loans obligated after September 30, 1991.

- Financing accounts borrow funds from Treasury, make direct loan disbursements, collect fees from lenders and borrowers, pay claims on guaranteed loans, collect principal and interest from borrowers, earn interest from Treasury on any uninvested funds, and transfer excess subsidy to Treasury General Fund receipt accounts. Financing accounts are presented separately in the combined statements of budgetary resources (SBR) as non-budgetary credit reform accounts to allow for a clear distinction from all other budgetary accounts. This facilitates reconciliation of the SBR to the Budget of the United States Government (President’s Budget).
- Program accounts receive and obligate appropriations to cover the positive subsidy cost of a direct loan or loan guarantee when the loan is approved and disburses the subsidy cost to the financing account

when the loan is issued. Program accounts also receive appropriations for administrative expenses.

- Treasury General Fund receipt accounts receive amounts paid from financing accounts when there are negative subsidies for new loan disbursements or downward re-estimates of the subsidy cost of existing loans. (See Note 11)

The Department records an obligation each year for direct loan awards to be made in a fiscal year based on estimates of schools’ receipt of aid applications. The Department advances funds to schools based on these estimates. Promissory notes are signed when schools reach individual agreements with borrowers and the schools subsequently report each disbursement of advanced funds to the Department. A new promissory note is usually not required for students in the second or later year of study. Half of all loan awards are issued in the fourth quarter of the fiscal year. Loans awarded are typically disbursed in multiple installments over an academic period. As a result, loans may be disbursed over multiple fiscal years. Loan awards may not be fully disbursed due to students leaving or transferring to other schools. The Department’s obligation estimate may also not reflect the actual amount of awards made. Based on historical averages, the Department expects approximately 7.8 percent of the amount obligated for new loan awards will not be disbursed.

When a loan is placed in deferment or forbearance, loan repayment is temporarily suspended with the length of postponement different for each lender. Interest accrues while a loan is in deferment or forbearance. Loans are cancelled if a person dies, meets disability requirements, or through the bankruptcy courts. Loans are also cancelled through the Public Service Loan Forgiveness (PSLF) Program, which forgives the remaining balance on a direct loan after 120 qualifying monthly payments are made. These payments must be made under a qualifying repayment plan while working full-time for a qualifying employer. In addition, the Department offers the Pay As You Earn (PAYE) program. This student loan repayment program is designed to help borrowers who struggle to make their normal student loan payments. The plan allows payments to be limited to 10 percent of discretionary income if qualifications are met. Under the PAYE program, if all requirements are met, forgiveness of the remaining balance of a student loan is possible after 20 years of consistent payments.

BUDGETARY RESOURCES

Budgetary resources are amounts available to enter into new obligations and to liquidate them. The Department's budgetary resources include unobligated balances of resources from prior years and new resources, which include appropriations, authority to borrow from Treasury, and spending authority from collections.

Borrowing authority is an indefinite budgetary resource authorized under the FCRA. This resource, when realized, finances the unsubsidized portion of the Direct Loan, FFEL, and other loan programs. In addition, borrowing authority is requested to cover the cost of the initial loan disbursement as well as any related negative subsidy to be transferred to Treasury General Fund receipt accounts. Treasury prescribes the terms and conditions of borrowing authority and lends to the financing account amounts as appropriate. Amounts borrowed, but not yet disbursed, are included in uninvested funds and earn interest. Treasury uses the same weighted average interest rates for both the interest charged on borrowed funds and the interest earned on uninvested funds. Treasury sets a different fixed interest rate to be used for each loan cohort once the loans are substantially disbursed. The Department may carry forward borrowing authority to future fiscal years provided that cohorts are disbursing loans. All borrowings from Treasury are effective on October 1st of the current fiscal year, regardless of when the Department borrowed the funds, except for amounts borrowed to make annual interest payments.

Authority to borrow from Treasury provides most of the funding for disbursements made under the Direct Loan, FFEL, and other loan programs. Subsidy and administrative costs of the programs are funded by appropriations. Borrowings are repaid using collections from borrowers, fees, and interest on uninvested funds.

Unobligated balances represent the cumulative amount of budgetary resources that are not obligated and that remain available for obligation under law, unless otherwise restricted. Resources expiring at the end of the fiscal year remain available for five years, but only for upward adjustments of prior year obligations, after which they are cancelled and may not be used. Resources that have not expired at year-end are available for new obligations, as well as upward adjustments of prior-year obligations. Funds are appropriated on an annual, multiyear, or no-year basis. Appropriated funds expire

on the last day of availability and are no longer available for new obligations. Amounts in expired funds are unavailable for new obligations, but may be used to adjust previously established obligations.

Permanent Indefinite Budget Authority. The Direct Loan, FFEL, and other loan programs have permanent indefinite budget authority through legislation to fund subsequent increases to the estimated future costs of the loan programs. Parts B and D of the HEA pertain to the existence, purpose, and availability of permanent indefinite budget authority for these programs.

Reauthorization of Legislation. Funds for most Department programs are authorized, by statute, to be appropriated for a specified number of years, with an automatic one-year extension available under Section 422 of the *General Education Provisions Act*. Congress may continue to appropriate funds after the expiration of the statutory authorization period, effectively reauthorizing the program through the appropriations process. The current *Budget of the United States Government* presumes all programs continue in accordance with congressional budgeting rules. (See Note 11)

ENTITY AND NON-ENTITY ASSETS

Assets are classified as either entity or non-entity assets. Entity assets are those that the Department has authority to use for its operations. Non-entity assets are those held by the Department but not available for use in its operations. Non-entity assets are offset by liabilities to third parties and have no impact on net position. The Department combines its entity and non-entity assets on the balance sheet and discloses its non-entity assets in the notes. (See Note 2)

FUND BALANCE WITH TREASURY

Fund Balance with Treasury includes amounts available to pay current liabilities and finance authorized purchases, as well as funds restricted until future appropriations are received. Treasury processes cash receipts and cash disbursements for the Department. The Department's records are reconciled with Treasury's. (See Note 3)

ACCOUNTS RECEIVABLE

Accounts receivable are amounts due to the Department from the public and other federal agencies. Receivables from the public result from overpayments to recipients

of grants and other financial assistance programs, as well as disputed costs resulting from audits of educational assistance programs. Amounts due from federal agencies result from reimbursable agreements entered into by the Department with other agencies to provide various goods and services. Accounts receivable are reduced to net realizable value by an allowance for uncollectible amounts. The estimate of an allowance for loss on uncollectible accounts is based on the Department's experience in the collection of receivables and an analysis of the outstanding balances. (See Note 4)

GUARANTY AGENCIES' FEDERAL FUNDS

Guaranty Agencies' Federal Funds are primarily comprised of the federal government's interest in the program assets held by state and nonprofit FFEL program guaranty agencies. Section 422A of the HEA required FFEL guaranty agencies to establish federal student loan reserve funds (federal funds). Federal funds include initial federal start-up funds, receipts of federal reinsurance payments, insurance premiums, guaranty agency share of collections on defaulted loans, investment income, administrative cost allowances, and other assets.

The balance in the Federal Fund represents consolidated reserve balances of the 26 guaranty agencies based on the Guaranty Agency financial reports that each agency submits annually to the Department. Although the Department and the guaranty agencies operate on different fiscal years, all guaranty agencies are subject to an annual audit. A year-end valuation adjustment is made to adjust the Department's balances in order to comply with federal accounting principles and disclose funds held outside of Treasury.

Guaranty Agencies' Federal Funds are classified as non-entity assets with the public and are offset by a corresponding liability due to Treasury. The federal funds are held by the guaranty agencies but can only be used for certain specific purposes listed in the Department's regulations. The federal funds are the property of the U.S. and are reflected in the *Budget of the United States Government*. Payments made to the Department from guaranty agencies' federal funds through a statutory recall or agency closures represent capital transfers and are returned to Treasury's General Fund. (See Notes 2, 4, and 9)

CREDIT PROGRAM RECEIVABLES, NET AND LIABILITIES FOR LOAN GUARANTEES

The financial statements reflect the Department's estimate of the long-term subsidy cost of direct and guaranteed loans in accordance with the FCRA. Loans and interest receivable are valued at their gross amounts less an allowance for the present value of amounts not expected to be recovered and thus having to be subsidized—called an "allowance for subsidy." The difference between the gross amount and the allowance for subsidy is the present value of the cash flows to, and from, the Department that are expected from receivables over their projected lives. Similarly, liabilities for loan guarantees are valued at the present value of the cash outflows from the Department less the present value of related inflows. The estimated present value of net long-term cash outflows of the Department for subsidized costs is net of recoveries, interest supplements, and offsetting fees.

The liability for loan guarantees presents the net present value of all future cash flows from currently insured FFEL loans, including claim payments, interest assistance, allowance payments, and recoveries from assigned loans. Guaranteed loans that default are initially turned over to guaranty agencies for collection. Defaulted FFEL loans are accounted for as assets and reported at their net present value, similar to direct loans, although they are legally not direct student loans. Credit program receivables, net includes defaulted FFEL loans owned by the Department and held by the Department or guaranty agencies. In most cases, after approximately four years, defaulted guaranteed loans not in repayment are turned over by the guaranty agencies to the Department for collection.

FFEL program receivables include purchased loans and other interests acquired under an expired program. The cash flows related to these receivables include collections on purchased loans and other activities, including transfers of re-estimated subsidy. The cash flows of these authorities also include inflows and outflows associated with the underlying or purchased loans and other related activities, including any positive or negative subsidy transfers.

Capitalization of interest occurs as a result of various initiatives, such as loan consolidations. As a result, interest receivable is reduced and loan principal is increased. (See Note 5)

PROPERTY AND EQUIPMENT, NET AND LEASES

The Department has very limited acquisition costs associated with buildings, furniture, and equipment as all Department and contractor staff are housed in leased buildings. The Department does not own real property for the use of its staff. The Department leases office space from the General Services Administration (GSA). The lease contracts with GSA for privately and publicly owned buildings are operating leases.

The Department also leases information technology and telecommunications equipment, as part of a contractor-owned, contractor-operated services contract. Lease payments associated with this equipment have been determined to be operating leases and, as such, are expensed as incurred. The noncancellable lease term is one year, with the Department holding the right to extend the lease term by exercising additional one-year options. (See Notes 4 and 13)

LIABILITIES

Liabilities represent actual and estimated amounts to be paid as a result of transactions or events that have already occurred.

- Liabilities are classified as covered by budgetary resources if budgetary resources are available to pay them. Credit program liabilities funded by permanent indefinite appropriations are also considered covered by budgetary resources.
- Liabilities are classified as not covered by budgetary resources when congressional action is needed before they can be paid. Although future appropriations to fund these liabilities are likely, it is not certain that appropriations will be enacted to fund these liabilities.
- Liabilities not requiring appropriated budgetary resources include those related to deposit funds, Subsidy Due to Treasury General Fund for Future Liquidating Account Collections (pre-1992 loan guaranty programs), and Federal Perkins Loan Program balances due to be repaid to the Treasury General Fund. (See Note 6)

DEBT

The Department borrows from Treasury to provide funding for the Direct Loan, FFEL, and other credit programs for higher education. The liability to Treasury from borrowings represents unpaid principal at year-end. The Department repays the principal based on available fund balances. Interest rates are based on the corresponding rate for 10-year Treasury securities and are set for those borrowings supporting each cohort of loans once the loans for that cohort are substantially disbursed. Interest is paid to Treasury on September 30th. In addition, the Federal Financing Bank (FFB) holds bonds issued by a designated bonding authority, on behalf of the Department, for the HBCU Capital Financing program. The debt for other credit programs for higher education includes the liability for full payment of principal and accrued interest for the FFB-financed HBCU Capital Financing program. (See Note 7)

SUBSIDY DUE TO TREASURY GENERAL FUND

The Department must transfer to the Treasury General Fund all excess funding resulting from downward re-estimates of credit program loans that are subject to FCRA requirements. This excess funding is included in the liability for subsidy due to Treasury and will be transferred to Treasury in the succeeding fiscal year upon receipt of authority from OMB. Subsidy due to Treasury also includes future liquidating account collections (estimated collections in excess of estimated outlays) for the Department's pre-1992 FFEL and HEAL loans that, when collected, will also be transferred to the Treasury General Fund. (See Note 8)

ACCOUNTS PAYABLE

Accounts payable include amounts owed by the Department for goods and services received from other entities, as well as payments not yet processed. Accounts payable to the public primarily consists of in-process grant and loan disbursements, including an accrued liability for schools that have disbursed loans prior to requesting funds. (See Note 9)

ACCRUED GRANT LIABILITY

Some grant recipients incur allowable expenditures as of the end of an accounting period but have not been reimbursed by the Department. The Department accrues a liability for these allowable expenditures. The amount is estimated using statistical sampling of unliquidated balances. (See Note 9)

PERSONNEL COMPENSATION AND OTHER EMPLOYEE BENEFITS

Annual, Sick, and Other Leave. The liability for annual leave, compensatory time off, and other vested leave is accrued when earned and reduced when taken. Each year, the accrued annual leave account balance is adjusted to reflect current pay rates. Sick leave and other types of nonvested leave are expensed as taken. Annual leave earned but not taken, within established limits, is funded from future financing sources. (See Notes 6 and 9)

Retirement Plans and Other Retirement Benefits.

Employees participate in either the Civil Service Retirement System (CSRS), a defined benefit plan, or the Federal Employees Retirement System (FERS), a defined benefit and contribution plan. For CSRS employees, the Department contributes a fixed percentage of pay.

FERS consists of Social Security, a basic annuity plan, and the Thrift Savings Plan. The Department and the employee contribute to Social Security and the basic annuity plan at rates prescribed by law. In addition, the Department is required to contribute to the Thrift Savings Plan a minimum of 1 percent per year of the basic pay of employees covered by this system, match voluntary employee contributions up to 3 percent of the employee's basic pay, and match one-half of contributions between 3 percent and 5 percent of the employee's basic pay. For FERS employees, the Department also contributes the employer's share of Medicare.

Contributions for CSRS, FERS, and other retirement benefits are insufficient to fund the programs fully and are subsidized by the Office of Personnel Management (OPM). The Department imputes its share of the OPM subsidy, using cost factors provided by OPM, and reports the full cost of the programs related to its employees.

Federal Employees' Compensation Act. *The Federal Employees' Compensation Act* (FECA) (Pub. L. 103-3) provides income and medical cost protection to

covered federal civilian employees injured on the job, to employees who have incurred work-related occupational diseases, and to beneficiaries of employees whose deaths are attributable to job-related injuries or occupational diseases. The FECA program is administered by the Department of Labor (DOL), which pays valid claims and subsequently seeks reimbursement from the Department for these paid claims.

The FECA liability consists of two elements. The first element, accrued FECA liability, is based on claims paid by DOL but not yet reimbursed by the Department. The Department reimburses DOL for claims as funds are appropriated for this purpose. In general, there is a two- to three-year period between payment by DOL and reimbursement to DOL by the Department. As a result, the Department recognizes an intragovernmental liability, not covered by budgetary resources, for the claims paid by DOL that will be reimbursed by the Department.

The second element, actuarial FECA liability, is the estimated liability for future benefit payments and is recorded as a liability with the public, not covered by budgetary resources. The actuarial FECA liability includes the expected liability for death, disability, medical, and miscellaneous costs for approved compensation cases. DOL determines the actuarial FECA liability annually, as of September 30, using an actuarial method that considers historical benefit payment patterns, wage inflation factors, medical inflation factors, and other variables. The projected annual benefit payments are discounted to present value. (See Notes 6 and 9)

NET COST OF OPERATIONS

As required by the *GPRA Modernization Act of 2010*, the Department's programs have been aligned with the goals presented in the Department's *Strategic Plan*. The Department updated its *Strategic Plan* in FY 2018 resulting in realigning how the activities of its program offices crosswalk to the revised *Strategic Plan* goals and the programs presented on the Statement of Net Cost. The Department elected not to reclassify the FY 2017 Statement of Net Cost that was aligned with its previous 2014 – 2018 *Strategic Plan*.

Net cost consists of gross costs less earned revenue. Major components of the Department's net costs include credit program subsidy expense, credit program interest revenue and expense, and grant expenses. (See Note 10)

Credit Program Subsidy Expense. Subsidy expense is an estimate of the present value cost of providing loans, but excludes the administrative costs of issuing and servicing the loans. In order to estimate subsidy expense, the Department must project lifetime cash flows associated with loans disbursed in a specific fiscal year (i.e., the loan cohort). The Department projects these lifetime cash flows using a set of econometric and financial models, as well as cash flow models. The Department estimates subsidy expenses annually for new loans disbursed in the current year; updates the previous cost estimates for outstanding loans disbursed in prior years (subsidy re-estimates); and updates previous cost estimates based on changes to terms of existing loans (loan modifications). Loan modifications include actions resulting from new legislation or from the exercise of administrative discretion under existing law, which directly or indirectly alters the estimated subsidy cost of outstanding direct loans (or direct loan obligations). (See Notes 5 and 10)

Credit Program Interest Revenue and Expense. The Department recognizes interest revenue from the public when interest is accrued on Direct Loan program loans, defaulted and acquired FFEL loans, and outstanding principal for other loan programs. Interest due from borrowers is accrued at least monthly and is satisfied upon collection or capitalization into the loan principal. Federal interest revenue is recognized on the unused fund balances with Treasury in the financing accounts.

Federal interest expense is recognized monthly on the outstanding borrowing from Treasury (debt) used to finance direct loan and loan guarantee programs. Accrued interest to Treasury is paid on September 30th. The interest rate for federal interest expense is the same as the rate used for federal interest revenue.

Interest expense equals interest revenue plus administrative fees accrued for all credit programs due to subsidy amortization. Subsidy amortization is required by the FCRA and accounts for the difference between interest expense and revenue cash flows. For direct loans, the allowance for subsidy is adjusted with the offset to interest revenue. For guaranteed loans, the liability for loan guarantees is adjusted with the offset to interest expense. (See Note 10)

NET POSITION

Net position consists of unexpended appropriations and cumulative results of operations. Unexpended

appropriations include undelivered orders and unobligated balances, except for amounts in financing accounts, liquidating accounts, and trust funds. Cumulative results of operations represent the net difference since inception between (1) expenses and (2) revenues and financing sources.

ALLOCATION TRANSFERS

The Department is a party to allocation transfers as a receiving (child) entity with the Department of Health and Human Resources (HHS). Allocation transfers are legal delegations by one entity of its authority to obligate budget authority and outlay funds to another entity. A separate fund account (allocation account) is created in the U.S. Treasury as a subset of the parent fund account for tracking and reporting purposes. All allocation transfers of balances are credited to this account, and subsequent obligations and outlays incurred by the child entity are charged to this allocation account as they execute the delegated activity on behalf of the parent entity. All financial activity related to this allocation transfer (e.g., budget authority, obligations, outlays) is reported in the financial statements of the parent entity (HHS) from which the underlying legislative authority, appropriations and budget apportionments are derived.

TAXES

The Department is a Federal entity and is not subject to Federal, state or local taxes. Therefore, no provision for income taxes is recorded.

USE OF ESTIMATES

Department management is required to make certain estimates while preparing consolidated financial statements in conformity with GAAP. These estimates are reflected in the assets, liabilities, net cost, and net position of the financial statements and may differ from actual results. The Department's estimates are based on management's best knowledge of current events, historical experiences, and other assumptions that are believed to be reasonable under the circumstances. Significant estimates reported on the financial statements include: allocation of Department administrative overhead costs; allowance for subsidy and subsidy expense for direct, defaulted guaranteed, and acquired loans; the liability for loan guarantees; and grant liability and advance accruals. (See Notes 4, 5, 9, and 10)

RECLASSIFICATIONS

The following reclassifications were made to the prior year financial statements and notes to conform to the current year presentation. These changes had no effect on total assets, liabilities and net position, net cost of operations, or budgetary resources.

- The Combined Statements of Budgetary Resources were condensed to present budgetary resources, status of budgetary resources, and net outlays, while removing the presentation of the change in obligated balance to conform to FY 2018 changes in OMB Circular A-136.
- Note 6, Liabilities Not Covered by Budgetary Resources, was expanded to include the presentation of liabilities not requiring budgetary resources to conform to FY 2018 changes in OMB Circular A-136.

NOTE 2. Non-Entity Assets

(Dollars in Millions)

	2018		2017	
	Intragovernmental	With the Public	Intragovernmental	With the Public
Non-Entity Assets				
Fund Balance with Treasury	\$ 310	\$ -	\$ 260	\$ -
Credit Program Receivables, Net	-	551	-	495
Other Assets				
Guaranty Agencies' Federal Funds	-	2,176	-	2,077
Accounts Receivable, Net	-	65	-	68
Total Non-Entity Assets	310	2,792	260	2,640
Entity Assets	114,446	1,210,434	109,979	1,146,364
Total Assets	\$ 114,756	\$ 1,213,226	\$ 110,239	\$ 1,149,004

The Department's FY 2018 assets are predominantly entity assets (99.4 percent), leaving a small portion of assets remaining as non-entity assets. Non-entity intragovernmental assets primarily consist of balances in deposit and clearing accounts. Non-entity assets with the public primarily consist of guaranty agency reserves (77.9 percent), reported as Guaranty Agencies' Federal Funds, and Federal Perkins Loan program loan receivables (19.7 percent), reported as credit program receivables, net. Federal Perkins Loan program receivables are a non-entity asset because the assets are held by the Department but are not available for use by the Department. The corresponding liabilities for these non-entity assets are reflected in various accounts including intragovernmental accounts payable, Guaranty Agencies' Federal Funds Due to Treasury, and other liabilities. (See Note 9)

NOTE 3. Fund Balance with Treasury

(Dollars in Millions)

	2018	2017
Unobligated Balance		
Available	\$ 14,495	\$ 9,012
Unavailable	24,907	24,402
Obligated Balance, Not Disbursed	137,680	135,219
Authority Temporarily Precluded from Obligation	1	1
Borrowing Authority Not Yet Converted to Fund Balance with Treasury (Note 11)	(62,752)	(58,701)
Other	274	241
Total Fund Balance with Treasury	\$ 114,605	\$ 110,174

Available unobligated balances represent amounts that are apportioned for obligation in the current fiscal year. Unavailable unobligated balances represent amounts that are not apportioned for obligation during the current fiscal year and expired appropriations no longer available to incur new obligations. Total unavailable unobligated balance (\$24,907 million) differs from unapportioned and expired amounts on the SBR (\$27,083 million) due to the Guaranty Agencies' Federal Funds (\$2,176 million).

NOTE 4. Other Assets

(Dollars in Millions)

	2018		2017	
	Intragovernmental	With the Public	Intragovernmental	With the Public
Guaranty Agencies' Federal Funds	\$ -	\$ 2,176	\$ -	\$ 2,077
Accounts Receivable, Net	1	154	1	172
Advances	150	15	64	1
Property and Equipment, Net	-	29	-	33
Other	-	3	-	2
Total Other Assets	\$ 151	\$ 2,377	\$ 65	\$ 2,285

Included in the accounts receivable with the public are amounts owed as a result of criminal restitution orders that are to be collected by the Department of Justice on behalf of the Department of Education. Amounts collected for these criminal restitutions are generally returned to the Treasury General Fund. Gross receivables and the allowance for uncollectible amounts as of September 30, 2018, related to criminal restitutions totaled \$78.8 million and (\$70.5) million, respectively.

NOTE 5. Credit Programs for Higher Education: Credit Program Receivables, Net and Liabilities for Loan Guarantees

Credit Program Receivables
(Dollars in Millions)

	Principal	Accrued Interest	Allowance for Subsidy (Present Value)	Net
2018				
Direct Loan Program	\$ 1,083,735	\$ 71,981	\$ (40,663)	\$ 1,115,053
FFEL Program	95,083	21,116	(23,252)	92,947
Other Credit Programs for Higher Education	3,108	437	(696)	2,849
Total Credit Receivables	\$ 1,181,926	\$ 93,534	\$ (64,611)	\$ 1,210,849
2017				
Direct Loan Program	\$ 998,825	\$ 59,534	\$ (16,805)	\$ 1,041,554
FFEL Program	101,601	19,338	(18,529)	102,410
Other Credit Programs for Higher Education	3,157	409	(811)	2,755
Total Credit Receivables	\$ 1,103,583	\$ 79,281	\$ (36,145)	\$ 1,146,719

The federal student loan programs provide students and their families with the funds to help meet postsecondary education costs. Funding for these programs is provided through permanent indefinite budget authority. What follows is additional analysis of the activity, costs and adjustments for each of the loan programs.

DIRECT LOAN PROGRAM.

The federal government makes loans directly to students and parents through participating institutions of higher education under the Direct Loan program. Direct loans are originated and serviced through contracts with private vendors.

Direct Loan program loan receivables include defaulted and nondefaulted loans owned by the Department. Of the \$1,155.7 billion in gross loan receivables, as of September 30, 2018, \$84.9 billion (7.3 percent) in loan principal was in default and had been transferred to the Department’s defaulted loan servicer, compared to \$70.7 billion (6.7 percent) as of September 30, 2017.

Direct Loan Program Reconciliation of Allowance for Subsidy (Dollars in Millions)

	2018	2017
Beginning Balance, Allowance for Subsidy	\$ 16,805	\$ (5,292)
Activity		
Fee Collections	1,696	1,694
Loan Cancellations	(7,521)	(7,689)
Subsidy Allowance Amortization	25,918	23,276
Other	(604)	(513)
Total Activity	19,489	16,768
Subsidy Expense for Direct Loans Disbursed in the Current Year by Component		
Interest Rate Differential	1,614	(13,045)
Defaults, Net of Recoveries	1,106	(133)
Fees	(1,747)	(1,968)
Other	(4,103)	12,541
Total of the Above Subsidy Expense Components	(3,130)	(2,605)
Components of Loan Modifications		
Loan Modification Costs	144	-
Modification Adjustment Transfers Gain	(8)	-
Loan Modifications	136	-
Components of Subsidy Re-estimates		
Interest Rate Re-estimates	(4,573)	(5,765)
Technical and Default Re-estimates	11,936	13,699
Upward Subsidy Re-estimates	7,363	7,934
Ending Balance, Allowance for Subsidy	\$ 40,663	\$ 16,805

The estimation process used to determine the amount of positive or negative subsidy expense each fiscal year, and subsequently the cumulative taxpayer cost of the program (allowance for subsidy), is subject to various internal and external risk factors which often show strong interdependence with one another. These risks include uncertainty about changes in the general economy, changes in the legislative and regulatory environment, and changing trends in borrower performance with regard to contractual cash flows within the loan programs.

Due to the complexity of the Direct Loan program, there is inherent projection risk in the process used for estimating long-term program costs. As stated, some uncertainty stems from potential changes in student loan legislation and regulations because these changes may fundamentally alter the cost structure of the program. Operational and policy shifts, such as growing efforts to increase borrower enrollment in income-driven repayment (IDR) plans, may also affect program costs by causing significant changes in borrower repayment timing. Actual performance may deviate from estimated performance, which is not unexpected given the long-term nature of these loans (cash flows may be estimated up to 40 years), and the multitude of projection paths and possible outcomes. The increasing enrollment of borrowers in the IDR plans has made projection of borrower incomes a key input for the estimation process. This uncertainty is directly tied to the macroeconomic climate and is another inherent program element that displays the interrelated risks facing the Direct Loan program.

Loan cancellations include write-offs of loans because the borrower died, became disabled, or declared bankruptcy. The interest rate re-estimate reflects the cost of finalizing the Treasury borrowing rate to be used for borrowings received to fund the disbursed portion of the loan awards obligated. Other components of subsidy transfers consist of contract collection costs, program review collections, fees, loan forgiveness under PAYE and other accruals.

Direct Loan Program Interest Expense and Revenues (See Note 10) (Dollars in Millions)

	2018	2017
Interest Expense on Treasury Borrowing	\$ 32,329	\$ 31,286
Total Interest Expense	\$ 32,329	\$ 31,286
Interest Revenue from the Public	\$ 54,157	\$ 50,142
Interest Revenue on Uninvested Funds	3,890	4,258
Administrative Fees	200	162
Amortization of Subsidy	(25,918)	(23,276)
Total Revenues	\$ 32,329	\$ 31,286

Direct Loan Program Subsidy Expense (Dollars in Millions)

	2018	2017
Subsidy Expense for Direct Loans Disbursed in the Current Year		
Interest Rate Differential	\$ 1,614	\$ (13,045)
Defaults, Net of Recoveries	1,106	(133)
Fees	(1,747)	(1,968)
Other	(4,103)	12,541
Total Subsidy Expense for Direct Loans Disbursed in the Current Year	(3,130)	(2,605)
Loan Modifications	136	-
Upward Subsidy Re-estimates	7,363	7,934
Direct Loan Subsidy Expense	\$ 4,369	\$ 5,329

FY 2018 Direct Loan Program Modifications. The Department recognized net loan modifications totaling \$136 million in FY 2018. The FY 2018 modifications include the cost associated with the policy change related to forgiving accrued interest on borrower defense claims that have been denied and pending for more than one year. In addition, the *Consolidated Appropriations Act, 2018* provided limited, additional conditions under which a borrower may become eligible for PSLF if some or all of the payments were made under a nonqualifying repayment plan. Finally, an \$8 million upward modification was recorded based on the *Bipartisan Budget Act of 2018* which gives the Department broad authority to forgive Direct Loans received by students who did not complete the period for which they enrolled as a result of hurricanes Maria and Irma that disrupted Puerto Rico and the U.S. Virgin Islands in 2017.

Upward Subsidy Re-estimates for All Prior Year Loan Cohorts. Direct Loan program re-estimated subsidy cost was adjusted upward by \$7.4 billion in FY 2018. Re-estimated costs only include cohorts that are 90 percent disbursed; cohort years 1994–2017. In addition to the major assumption updates described below, the re-estimate reflects several other assumption updates, including interest rates provided by OMB, volume, and enter repayment rates.

- **IDR Model Changes.** In 2018, the Department updated several assumptions within its IDR submodel and refined the logic for borrowers switching between IDR plans. These updates led to a net downward re-estimate of \$4.1 billion.
- **Repayment Plan Selection.** The Department incorporated new repayment plan data that showed a continuing increase in IDR plan usage. The update also reflects changes in interpretation of repayment plan codes for Direct Loan consolidations. Much of the consolidation loan volume that was previously classified as standard (ten-year fixed) is now

classified as extended. Also, the Department changed the methodology for assigning and forecasting plans from an origination cohort basis to an enter repayment cohort basis. Lastly, the Department placed limits on forecasted growth of IDR participation to reflect an anticipated saturation point. The combined effect of these changes was a net upward re-estimate of \$2.1 billion.

- **Default Rates.** The Department made updates to the default rate model in FY 2018, primarily reflecting updates in the data, which led to a net upward re-estimate of \$14.8 billion.

With the increase in IDR participation, the Department also conducted sensitivities on incomes for students in IDR and PSLF plans. For example, a 5 percent upward increase in borrower incomes decreases costs by almost \$1.3 billion for cohort 2017. A 5 percent increase in PSLF plan participation would increase costs by \$0.4 billion for cohort 2017.

Direct Loan Subsidy Rates—Cohort 2018

	Interest Differential	Defaults	Fees	Other	Total
Stafford	-0.01%	1.84%	-1.07%	7.54%	8.30%
Unsubsidized Stafford	-19.55%	1.34%	-1.07%	9.56%	-9.72%
PLUS	-33.15%	0.89%	-4.26%	8.73%	-27.79%
Consolidation	3.96%	0.37%	0.00%	9.85%	14.18%
Weighted Average Total	-11.95%	0.86%	-1.20%	8.92%	-3.37%

The subsidy rate represents the subsidy expense of the program in relation to the obligations or commitments made during the fiscal year and are weighted on gross volume. The subsidy rates shown above, which reflect aggregate negative subsidy in the FY 2018 cohort, cannot be applied to direct loans disbursed during the current reporting year to yield the subsidy expense, nor are these rates applicable to the portfolio as a whole. The Department does not re-estimate student loan cohorts until they are at least 90 percent disbursed. As a result, the financial statement re-estimate does not include a re-estimate of the current year cohort. The first re-estimate of this cohort will take place upon execution of the FY 2020 President's Budget.

The subsidy costs of the Department's student loan programs, especially the Direct Loan program, are highly sensitive to changes in actual and forecasted interest rates. The formulas for determining program interest rates are established by statute; the existing loan portfolio has a mixture of borrower and lender rate formulas. Interest rate projections are based on probabilistic interest rate scenario inputs developed and provided by OMB.

Direct Loan Program Loan Disbursements by Loan Type
 (Dollars in Millions)

	2018	2017
Stafford	\$ 20,343	\$ 23,368
Unsubsidized Stafford	49,009	51,410
PLUS	23,117	18,695
Consolidation	41,625	48,999
Total Disbursements	\$ 134,094	\$ 142,472

The allocation of disbursements for the first three loan types is estimated based on historical trend information.

Student and parent borrowers may prepay existing loans without penalty through a new consolidation loan. Under the FCRA and requirements provided by OMB regulations, the retirement of direct loans being consolidated is considered a collection of principal and interest. This receipt is offset by the disbursement related to the newly created consolidation loan. Underlying direct or guaranteed loans, performing or nonperforming, are paid off in their original cohort; new consolidation loans are originated in the cohort in which the new consolidation loan was obligated. Consolidation activity is taken into consideration in establishing subsidy rates for defaults and other cash flows. The cost of new consolidations is included in subsidy expense for the current-year cohort; the effect of prepayments on existing loans could contribute to re-estimates of prior cohort subsidy costs. The net receivables include estimates of future prepayments of existing loans through consolidations; they do not reflect subsidy costs associated with anticipated future consolidation loans.

Direct loan consolidations were \$41.6 billion during FY 2018 and \$49.0 billion during FY 2017. Under the FCRA, the subsidy costs of new consolidation loans are not reflected until the future fiscal year in which they are disbursed. The effect of the early payoff of the existing loans—those being consolidated—is recognized in the future projected cash flows of the past cohort year in which the loans were originated.

FEDERAL FAMILY EDUCATION LOAN PROGRAM.

As a result of the SAFRA Act, no new FFEL loans have been made since July 1, 2010. Federal guarantees on FFEL program loans and commitments remain in effect for loans made before July 1, 2010, unless they were sold to the Department through an ECASLA authority (acquired FFEL loans), consolidated into a direct loan, or otherwise satisfied, discharged, or cancelled. As of September 30, 2018 and 2017, total principal balances outstanding of guaranteed loans held by lenders were approximately \$157 billion and \$176 billion, respectively. As of September 30, 2018 and 2017, the estimated maximum government exposure on outstanding guaranteed loans held by lenders was approximately \$154 billion and \$173 billion, respectively. Of the insured amount, the Department would pay a smaller amount to the guaranty agencies. The rates range from 75 to 100 percent of the loan value depending on when the loan was made and the guaranty agency's claim experience.

FFEL Program Loan Receivables
(Dollars in Millions)

	Principal	Accrued Interest	Allowance for Subsidy (Present Value)	Net
2018				
DEFAULTED FFEL GUARANTEED LOANS				
FFEL GSL Program (Pre-1992)	\$ 3,917	\$ 5,836	\$ (8,077)	\$ 1,676
FFEL GSL Program (Post-1991)	33,849	7,802	(15,186)	26,465
Total Defaulted FFEL Guaranteed Loans	37,766	13,638	(23,263)	28,141
ACQUIRED FFEL LOANS				
Loan Purchase Commitment	19,277	2,435	(21)	21,691
Loan Participation Purchase	36,475	4,713	458	41,646
ABCP Conduit	1,565	330	(426)	1,469
Total Acquired FFEL Loans	57,317	7,478	11	64,806
FFEL Program Loan Receivables	\$ 95,083	\$ 21,116	\$ (23,252)	\$ 92,947
2017				
DEFAULTED FFEL GUARANTEED LOANS				
FFEL GSL Program (Pre-1992)	\$ 3,882	\$ 5,659	\$ (8,019)	\$ 1,522
FFEL GSL Program (Post-1991)	34,395	7,216	(13,838)	27,773
Total Defaulted FFEL Guaranteed Loans	38,277	12,875	(21,857)	29,295
ACQUIRED FFEL LOANS				
Loan Purchase Commitment	21,375	2,224	1,656	25,255
Loan Participation Purchase	40,288	3,947	2,072	46,307
ABCP Conduit	1,661	292	(400)	1,553
Total Acquired FFEL Loans	63,324	6,463	3,328	73,115
FFEL Program Loan Receivables	\$ 101,601	\$ 19,338	\$ (18,529)	\$ 102,410

FFEL Program Reconciliation of Liabilities for Loan Guarantees
(Dollars in Millions)

	2018	2017
Beginning Balance, FFEL Financing Account Liability for Loan Guarantees	\$ 3,636	\$ 1,417
Activity		
Interest Supplement Payments	(1,052)	(810)
Claim Payments	(5,716)	(5,819)
Fee Collections	1,550	1,633
Interest on Subsidy Amortization	(1,099)	(1,263)
Other	6,476	7,459
Total Activity	159	1,200
Upward/(Downward) Subsidy Re-estimates	(1,204)	1,019
Ending Balance, FFEL Financing Account Liability for Loan Guarantees	2,591	3,636
FFEL Liquidating Account Liability for Loan Guarantees	1	23
FFEL Liabilities for Loan Guarantees	\$ 2,592	\$ 3,659

Liabilities for Loan Guarantees is included as a component of other liabilities on the balance sheet (see Note 9).

Other activity includes negative special allowance collections, collections on defaulted FFEL loans, guaranty agency expenses, and loan cancellations due to death, disability, or bankruptcy.

Allowance for Subsidy Reconciliation for Acquired FFEL Loans
(Dollars in Millions)

	Loan Purchase Commitment	Loan Participation Purchase	ABCP Conduit	Total
2018				
Beginning Balance, Allowance for Subsidy	\$ (1,656)	\$ (2,072)	\$ 400	\$ (3,328)
Activity				
Subsidy Allowance Amortization	550	903	48	1,501
Loan Cancellations	(168)	(314)	(16)	(498)
Direct Asset Activities	(44)	(68)	(6)	(118)
Total Activity	338	521	26	885
Upward Subsidy Re-estimates	1,339	1,093	-	2,432
Ending Balance, Allowance for Subsidy	\$ 21	\$ (458)	\$ 426	\$ (11)
2017				
Beginning Balance, Allowance for Subsidy	\$ (2,922)	\$ (4,347)	\$ 374	\$ (6,895)
Activity				
Subsidy Allowance Amortization	635	1,219	53	1,907
Loan Cancellations	(203)	(390)	(19)	(612)
Direct Asset Activities	(45)	(67)	(8)	(120)
Total Activity	387	762	26	1,175
Upward Subsidy Re-estimates	879	1,513	-	2,392
Ending Balance, Allowance for Subsidy	\$ (1,656)	\$ (2,072)	\$ 400	\$ (3,328)

FFEL Program Subsidy Expense
(Dollars in Millions)

	2018	2017
Upward/(Downward) Subsidy Re-estimates		
FFEL Loan Guarantee Program	\$ (1,204)	\$ 1,019
Loan Purchase Commitment	1,339	879
Loan Participation Purchase	1,093	1,513
FFEL Program Subsidy Expense	\$ 1,228	\$ 3,411

FFEL subsidy cost was adjusted upward by \$1.2 billion in FY 2018. The net upward re-estimates in these programs were due primarily to interest rates provided by OMB and updated prepayment rates.

OTHER CREDIT PROGRAMS FOR HIGHER EDUCATION

Receivables, Net for Other Credit Programs for Higher Education

(Dollars in Millions)

	Principal	Accrued Interest	Allowance for Subsidy (Present Value)	Net
2018				
Federal Perkins Loans	\$ 474	\$ 297	\$ (220)	\$ 551
TEACH Program Loans	746	91	(253)	584
HEAL Program Loans	397	32	(69)	360
Facilities Loan Programs	1,491	17	(154)	1,354
Total	\$ 3,108	\$ 437	\$ (696)	\$ 2,849
2017				
Federal Perkins Loans	\$ 424	\$ 268	\$ (197)	\$ 495
TEACH Program Loans	723	95	(225)	593
HEAL Program Loans	398	30	(74)	354
Facilities Loan Programs	1,612	16	(315)	1,313
Total	\$ 3,157	\$ 409	\$ (811)	\$ 2,755

Federal Perkins Loan Program. The Federal Perkins Loan program provides low-interest loans to eligible postsecondary school students. In some statutorily defined cases, funds are provided to reimburse schools for loan cancellations. For defaulted loans assigned to the Department, collections of principal, interest, and fees, net of amounts paid by the Department to cover contract collection costs, are transferred to Treasury annually.

TEACH Grant Program. Department awards annual grants of up to \$4,000 to eligible undergraduate and graduate students who agree to serve as full-time mathematics, science, foreign language, bilingual education, special education, or reading teachers at high-need schools for four years within eight years of graduation. The maximum lifetime grant for students is \$16,000 for undergraduate programs and \$8,000 for graduate programs. For students failing to fulfill the service requirement, the grants are converted to direct unsubsidized Stafford Loans. The program is operated as a loan program under the FCRA for budget and accounting purposes since grants can be converted to direct loans.

TEACH Subsidy Rates—Cohort 2018

	Interest Differential	Defaults	Fees	Other	Total
Subsidy Rates	16.92%	0.25%	0.00%	5.89%	23.06%

HEAL Program. The Department assumed responsibility in FY 2014 for the HEAL program and the authority to administer, service, collect, and enforce the program. The HEAL program is structured as required by the FCRA. A liquidating account is used to record all cash flows to and from the government resulting from guaranteed HEAL loans committed prior to 1992. All loan activity for 1992 and beyond is recorded in corresponding financing accounts.

Facilities Loan Programs. The Department also administers the HBCU Capital Financing program. Since 1992, this program has given HBCUs access to financing for the repair, renovation, and in exceptional circumstances, the construction or acquisition of facilities, equipment, and infrastructure through federally insured bonds. The Department has authorized a designated bonding authority to make loans to eligible institutions, charge interest, and collect principal and interest payments. In compliance with HEA, as amended, the bonding authority maintains an escrow account to pay the principal and interest on bonds for loans in default.

The Department granted full forgiveness of \$322 million in loans made to the four historically black colleges and universities that suffered damage after Hurricanes Katrina and Rita struck the Gulf Coast in 2005. Dillard University, Southern University at New Orleans, Tougaloo College, and Xavier University of Louisiana collectively borrowed more than \$360 million through the HBCU Capital Financing Program in 2007. After struggling to repay the loans, the schools in 2013 received a five-year reprieve on payments that was set to expire in 2018. This additional disaster relief lifts a huge burden and enables the four HBCUs to continue their focus on serving their students and communities and provides one more step toward full recovery.

The total amount of support for HBCU programs, along with any accrued interest and unpaid servicing fees, will be capitalized to principal and be reamortized through the original maturity date of June 1, 2037. The Department has approximately \$1.5 billion in outstanding borrowing from the FFB to support loans made to HBCU institutions and \$230 million obligated to support near term lending as of September 30, 2018.

The Department administers the College Housing and Academic Facilities Loan program, the College Housing Loan program, and the Higher Education Facilities Loan program. From 1952 to 1993, these programs provided low-interest financing to institutions of higher education for the construction, reconstruction, and renovation of housing, academic, and other educational facilities.

NOTE 6. Liabilities Not Covered by Budgetary Resources
(Dollars in Millions)

	2018		2017	
	Intragovernmental	With the Public	Intragovernmental	With the Public
Liabilities Not Covered by Budgetary Resources				
Other Liabilities				
Accrued Unfunded Annual Leave	\$ -	\$ 37	\$ -	\$ 40
FECA Liabilities	3	15	3	14
Total Liabilities Not Covered by Budgetary Resources	3	52	3	54
Liabilities Not Requiring Budgetary Resources				
Subsidy Due to Treasury General Fund	2,037	-	1,784	-
Federal Perkins Loan Program	538	-	482	-
Miscellaneous Receipt, Deposit Funds and Clearing Accounts	34	317	52	270
Total Liabilities Not Requiring Budgetary Resources	2,609	317	2,318	270
Total Liabilities Covered by Budgetary Resources	1,267,654	8,541	1,187,396	12,042
Total Liabilities	\$ 1,270,266	\$ 8,910	\$ 1,189,717	\$ 12,366

NOTE 7. Debt**(Dollars in Millions)**

	Beginning Balance	Borrowing	Repayments	Ending Balance
2018				
Direct Loan Program	\$ 1,061,559	\$ 155,257	\$ (66,206)	\$ 1,150,610
FFEL Program	116,290	227	(9,256)	107,261
Other Credit Programs for Higher Education	2,222	336	(464)	2,094
Total	\$ 1,180,071	\$ 155,820	\$ (75,926)	\$ 1,259,965
2017				
Direct Loan Program	\$ 994,285	\$ 160,508	\$ (93,234)	\$ 1,061,559
FFEL Program	131,347	-	(15,057)	116,290
Other Credit Programs for Higher Education	2,191	255	(224)	2,222
Total	\$ 1,127,823	\$ 160,763	\$ (108,515)	\$ 1,180,071

The Department borrows from Treasury to fund the disbursement of new loans and the payment of credit program outlays and related costs. During FY 2018, debt increased 6.8 percent from \$1,180.1 billion in the prior year to \$1,260.0 billion. The Department makes periodic principal payments after considering the cash position and liability for future outflows in each cohort of loans, as mandated by the FCRA.

Approximately 91.3 percent of the Department's debt, as of September 30, 2018, is attributable to the Direct Loan program. The majority of the net borrowing activity (borrowing less repayments) for the year was designated for funding new Direct Loan disbursements.

The Department also borrows from Treasury for activity in the other credit programs for higher education. During FY 2018, TEACH net borrowing of \$15.3 million was used for the advance of new grants and repayments of principal made to Treasury. In FY 2018, debt in HBCU decreased by \$97.6 million, or 6.2 percent. This total represents the aggregate of new bonds administered and repayments made on previously issued bonds.

NOTE 8. Subsidy Due to Treasury General Fund

(Dollars in Millions)

	2018	2017
Credit Program Downward Subsidy Re-estimates		
Direct Loan Program	\$ 2,484	\$ 5,010
FFEL Program	3,015	219
Total Credit Program Downward Subsidy Re-estimates	5,499	5,229
Future Liquidating Account Collections		
FFEL Program	1,856	1,614
Other Credit Programs for Higher Education	181	170
Total Future Liquidating Account Collections	2,037	1,784
Total Subsidy Due to Treasury General Fund	\$ 7,536	\$ 7,013

NOTE 9. Other Liabilities

(Dollars in Millions)

	2018		2017	
	Intragovernmental	With the Public	Intragovernmental	With the Public
Accounts Payable	\$ 1	\$ 3,792	\$ 1	\$ 4,191
Accrued Grant Liability	-	1,914	-	3,959
Guaranty Agencies' Funds Due to Treasury	2,176	-	2,077	-
Loan Guarantee Liability	-	2,814	-	3,870
Federal Perkins Loan Program	538	-	482	-
Miscellaneous Receipt, Deposit Funds and Clearing Accounts	34	317	52	270
Advances from Others and Deferred Credits	7	4	10	7
Accrued Unfunded Annual Leave	-	37	-	40
FECA Liabilities	3	15	3	14
Accrued Payroll and Benefits	-	16	-	15
Employer Contributions and Payroll Taxes	5	1	8	-
Custodial Liabilities	1	-	-	-
Total Other Liabilities	\$ 2,765	\$ 8,910	\$ 2,633	\$ 12,366

NOTE 10. Net Cost of Operations

As required by the *GPRA Modernization Act of 2010*, the the Department’s programs have been aligned with the goals presented in the Department’s *Strategic Plans*. The Department updated its *Strategic Plan* in FY 2018, resulting in realigning how the activities of its program offices crosswalk to the revised *Strategic Plan* goals and the programs presented on the Statement of Net Cost as shown in the chart below. Goals 3 and 4 in the revised *Strategic Plan* are considered crosscutting goals, and therefore costs and revenues associated with these activities are included in the net cost programs associated with goals 1 and 2.

The Department elected not to reclassify the FY 2017 Statement of Net Cost that was aligned with its previous 2014 – 2018 *Strategic Plan*, as shown below.

Program Offices	Strategic Goal	Net Cost Program
FY 2018 NET COST STATEMENT PROGRAM ALIGNMENT WITH STRATEGIC PLAN 2018 – 2022		
OESE OSERS Other: OCTAE IES OELA OII OCR	Goal 1: Support state and local efforts to improve learning outcomes for all P–12 students in every community.	Improve learning outcomes for all P–12 students
FSA OSERS Other: OCTAE IES OPE OCR	Goal 2: Expand postsecondary education opportunities, improve outcomes to foster economic opportunity and promote an informed, thoughtful, and productive citizenry.	Expand postsecondary opportunities, improve outcomes to foster economic opportunity, and promote productive citizenry
All Offices	Goal 3: Strengthen the quality, accessibility, and use of education data through better management, increased privacy protections, and transparency.	Crosscutting Goal
All Offices	Goal 4: Reform the effectiveness, efficiency, and accountability of the Department.	Crosscutting Goal
FY 2017 NET COST STATEMENT PROGRAM ALIGNMENT WITH STRATEGIC PLAN 2014 – 2018		
FSA OPE OCTAE	Goal 1: Postsecondary Education, Career and Technical Education, and Adult Education. Increase college access, affordability, quality, and completion by improving postsecondary education and lifelong learning opportunities for youths and adults.	Increase College Access, Quality, and Completion
OESE	Goal 2: Elementary and Secondary Education. Improve the elementary and secondary education system’s ability to consistently deliver excellent instruction aligned with rigorous academic standards while providing effective support services to close achievement and opportunity gaps, and ensure all students graduate high school college- and career-ready. Goal 3: Early Learning. Improve the health, social-emotional, and cognitive outcomes for all children from birth through 3rd grade, so that all children, particularly those with high needs, are on track for graduating from high school college- and career-ready.	Improve Preparation for College and Career from Birth Through 12th Grade, Especially for Children with High Needs
OELA OCR OSERS	Goal 4: Equity. Increase educational opportunities for underserved students and reduce discrimination so that all students are well-positioned to succeed.	Ensure Effective Educational Opportunities for All Students
IES OII	Goal 5: Continuous Improvement of the U.S. Education System. Enhance the education system’s ability to continuously improve through better and more widespread use of data, research and evaluation, evidence, transparency, innovation, and technology.	Enhance the Education System’s Ability to Continuously Improve
All Other Offices	Goal 6: U.S. Department of Education Capacity. Improve the organizational capacities of the Department to implement this <i>Strategic Plan</i> .	Crosscutting Goal

Gross Costs and Earned Revenue by Program

(Dollars in Millions)

	2018				
	FSA	OESE	OSERS	Other	Total
IMPROVE LEARNING OUTCOMES FOR ALL P-12 STUDENTS					
Gross Cost					
Grants	\$ -	\$ 20,856	\$ 13,073	\$ 2,526	\$ 36,455
Other	-	58	1	763	822
Earned Revenue	-	-	-	(82)	(82)
Net Program Costs	-	20,914	13,074	3,207	37,195
EXPAND POSTSECONDARY OPPORTUNITIES, IMPROVE OUTCOMES TO FOSTER ECONOMIC OPPORTUNITY, AND PROMOTE PRODUCTIVE CITIZENRY					
<u>Direct Loan Program</u>					
Gross Cost					
Credit Program Interest Expense	32,329	-	-	-	32,329
Subsidy Expense	4,369	-	-	-	4,369
Administrative Expenses	1,267	-	-	-	1,267
Earned Revenue					
Interest & Administrative Fees	(58,247)	-	-	-	(58,247)
Subsidy Amortization	25,918	-	-	-	25,918
Net Cost of Direct Loan Program	5,636	-	-	-	5,636
<u>FFEL Program</u>					
Gross Cost					
Credit Program Interest Expense	4,233	-	-	-	4,233
Subsidy Expense	1,228	-	-	-	1,228
Subsidy Amortization (Guaranteed Loans)	(1,099)	-	-	-	(1,099)
Guaranty Agencies	96	-	-	-	96
Administrative Expenses	141	-	-	-	141
Earned Revenue					
Interest & Administrative Fees	(4,635)	-	-	-	(4,635)
Subsidy Amortization (Acquired FFEL Loans)	1,501	-	-	-	1,501
Guaranty Agencies	(202)	-	-	-	(202)
Net Cost of FFEL Program	1,263	-	-	-	1,263
<u>Other Credit Programs for Higher Education</u>					
Gross Cost					
Credit Program Interest Expense	19	-	-	54	73
Subsidy Expense	56	-	-	168	224
Administrative Expenses	1	-	-	-	1
Earned Revenue					
Interest & Administrative Fees	(48)	-	-	(60)	(108)
Subsidy Amortization	29	-	-	6	35
Other	(540)	-	-	(8)	(548)
Net Cost of Other Credit Programs for Higher Education	(483)	-	-	160	(323)
<u>Non-Credit Programs</u>					
Gross Cost					
Grants	28,456	1	3,476	3,438	35,371
Other	136	-	2	255	393
Earned Revenue	-	-	-	(10)	(10)
Net Cost of Non-Credit Programs	28,592	1	3,478	3,683	35,754
Net Program Costs	35,008	1	3,478	3,843	42,330
Total Gross Costs	71,232	20,915	16,552	7,204	115,903
Total Earned Revenues	(36,224)	-	-	(154)	(36,378)
Net Cost of Operations	\$ 35,008	\$ 20,915	\$ 16,552	\$ 7,050	\$ 79,525

Gross Costs and Earned Revenue by Program
(Dollars in Millions)

	2017				
	FSA	OESE	OSERS	Other	Total
INCREASE COLLEGE ACCESS, QUALITY, AND COMPLETION					
Gross Cost					
Intragovernmental	\$ 36,054	\$ -	\$ -	\$ 65	\$ 36,119
With the Public	37,717	-	-	4,453	42,170
Total Gross Program Costs	73,771	-	-	4,518	78,289
Earned Revenue					
Intragovernmental	(5,335)	-	-	(14)	(5,349)
With the Public	(30,490)	-	-	(48)	(30,538)
Total Program Earned Revenue	(35,825)	-	-	(62)	(35,887)
Net Program Costs	37,946	-	-	4,456	42,402
IMPROVE PREPARATION FOR COLLEGE AND CAREER FROM BIRTH THROUGH 12TH GRADE, ESPECIALLY FOR CHILDREN WITH HIGH NEEDS					
Gross Cost					
Intragovernmental	-	176	-	-	176
With the Public	-	22,400	-	1	22,401
Total Gross Program Costs	-	22,576	-	1	22,577
Earned Revenue					
With the Public	-	(10)	-	-	(10)
Total Program Earned Revenue	-	(10)	-	-	(10)
Net Program Costs	-	22,566	-	1	22,567
ENSURE EFFECTIVE EDUCATIONAL OPPORTUNITIES FOR ALL STUDENTS					
Gross Cost					
Intragovernmental	-	-	16	36	52
With the Public	-	-	16,370	836	17,206
Total Gross Program Costs	-	-	16,386	872	17,258
Earned Revenue					
With the Public	-	-	(10)	(1)	(11)
Total Program Earned Revenue	-	-	(10)	(1)	(11)
Net Program Costs	-	-	16,376	871	17,247
ENHANCE THE EDUCATION SYSTEM'S ABILITY TO CONTINUOUSLY IMPROVE					
Gross Cost					
Intragovernmental	-	-	-	85	85
With the Public	-	-	-	2,037	2,037
Total Gross Program Costs	-	-	-	2,122	2,122
Earned Revenue					
With the Public	-	-	-	(59)	(59)
Total Program Earned Revenue	-	-	-	(59)	(59)
Net Program Costs	-	-	-	2,063	2,063
Net Cost of Operations	\$ 37,946	\$ 22,566	\$ 16,376	\$ 7,391	\$ 84,279

Credit Program Interest Expense and Revenues
(Dollars in Millions)

	Gross Interest Expense		Net Interest Expense	Gross Interest and Administrative Fee Revenue		Subsidy Amortization	Net Revenue
	Intragovernmental	With the Public		Intragovernmental	With the Public	With the Public	
2018							
Direct Loan Program	\$ 32,329	\$ -	\$ 32,329	\$ 3,890	\$ 54,357	\$ (25,918)	\$ 32,329
FFEL Program	4,233	(1,099)	3,134	1,032	3,603	(1,501)	3,134
Other Credit Programs for Higher Education	73	-	73	23	85	(35)	73
Total	\$ 36,635	\$ (1,099)	\$ 35,536	\$ 4,945	\$ 58,045	\$ (27,454)	\$ 35,536
2017							
Direct Loan Program	\$ 31,286	\$ -	\$ 31,286	\$ 4,258	\$ 50,304	\$ (23,276)	\$ 31,286
FFEL Program	4,661	(1,263)	3,398	1,071	4,234	(1,907)	3,398
Other Credit Programs for Higher Education	69	-	69	20	81	(32)	69
Total	\$ 36,016	\$ (1,263)	\$ 34,753	\$ 5,349	\$ 54,619	\$ (25,215)	\$ 34,753

Interest expense equals interest revenue plus administrative fees accrued for all credit programs due to subsidy amortization. Subsidy amortization is required by the FCRA and accounts for the difference between interest expense and revenue cash flows. For direct loans, the allowance for subsidy is adjusted with the offset to interest revenue. For guaranteed loans, the liability for loan guarantees is adjusted with the offset to interest expense.

Grant Expenses by Appropriation (Dollars in Millions)

	2018
IMPROVE LEARNING OUTCOMES FOR ALL P-12 STUDENTS	
Education for the Disadvantaged	\$ 15,243
Special Education—Individuals With Disabilities Act (IDEA) Grants	13,073
School Improvement Programs	3,614
Impact Aid	1,466
Innovation and Improvement	1,201
English Language Acquisition	693
Career, Technical, and Adult Education	445
Institute of Educational Sciences	187
Other	533
Subtotal	<u>36,455</u>
EXPAND POSTSECONDARY OPPORTUNITIES, IMPROVE OUTCOMES TO FOSTER ECONOMIC OPPORTUNITY, AND PROMOTE PRODUCTIVE CITIZENRY	
Student Financial Assistance	
Pell Grants	26,672
Federal Work-Study Program	1,015
Federal Supplemental Educational Opportunity Grants	769
Rehabilitation Services	3,130
Higher Education	2,027
Career, Technical, and Adult Education	1,135
Special Education—Individuals With Disabilities Act (IDEA) Grants	120
Institute of Educational Sciences	43
Other	460
Subtotal	<u>35,371</u>
Total Grant Costs	\$ <u>71,826</u>

The Department has more than 100 grant programs (www.ed.gov/programs/inventory.html). Descriptions of the major grant programs are as follows:

Student Financial Assistance

- **Pell Grants**—provides need-based grants to students to promote access to postsecondary education. Grant amounts are dependent on: the student's expected family contribution; the cost of attendance (as determined by the institution); the student's enrollment status (full-time or part-time); and whether the student attends for a full academic year or less. Pell grants are the single largest source of grant aid for postsecondary education.
- **Federal Work-Study Program**—provides funds by formula to enable eligible institutions to offer employment to students based on financial needs. The program is available to full-time or part-time

students and encourages community service work. The work is often related to the student's course of study. This program is administered by the schools that participate in the Federal Work-Study program. Hourly earnings under this program must be at least the Federal minimum wage. Federal funding, in most cases, pays 75% of a student's hourly wage, with the remaining 25% paid by the employer.

- **Federal Supplemental Educational Opportunity Grants**—provides funds by formula to enable eligible institutions to offer grants to students based on need. Federal grants distributed under this program are administered directly by the financial aid office at each participating school.

Education for the Disadvantaged—primarily consists of Title I grants that provide financial assistance through state educational agencies to local educational agencies and public schools with high numbers or percentages of poor children to help ensure that all children meet challenging state academic content and student academic achievement standards. Also provides funds to states to support educational services to children of migratory farmworkers and fishers, and to neglected or delinquent children and youth in State-run institutions, attending community day programs, and correctional facilities.

Special Education—consists primarily of IDEA Grants that provide funds by formula to states to assist them in providing a free appropriate public education in the least restrictive environment for children with disabilities ages 3 through 21 and assists states in providing early intervention services for infants and toddlers birth through age two and their families. Also provides discretionary grants to institutions of higher education and other nonprofit organizations to support research, demonstrations, technical assistance and dissemination, technology, personnel development and parent-training, and information centers.

School Improvement Programs—provides funds to state educational agencies to make competitive subgrants to local educational agencies that demonstrate the greatest need for the funds and the strongest commitment to use the funds to provide adequate resources in order to substantially raise the achievement of students in their lowest-performing schools.

Rehabilitation Services—provides funds to states and other agencies to support vocational rehabilitation and other services to individuals with disabilities to maximize their employment, independence, and integration into the community and the competitive labor market.

Higher Education—includes Institutional Service grants designed to improve academic quality, institutional management and fiscal stability, and strengthen physical plants and endowments of institutions of higher education, with an emphasis on institutions that enroll large proportions of minority and financially disadvantaged students. Also includes Student Service grant programs supporting low-income, first-generation students and individuals with disabilities as they progress through the academic pipeline from middle school to graduate school, in addition to programs focused on college readiness, campus-based child care, and graduate fellowships. Also includes International and Foreign Language Education

grant and fellowship programs that strengthen foreign language instruction, area/international studies teaching and research, professional development for educators, and curriculum development at the K–12, graduate, and postsecondary levels.

Career, Technical, and Adult Education—includes programs that are related to adult education and literacy, career and technical education, and community colleges.

Impact Aid—provides funds to local educational agencies to replace the lost local revenue that would otherwise be available to educate federal connected children. (The property on which the children live and their parents work is exempt from local property taxes, limiting a central source of revenue used by most communities to finance education.)

Innovation and Improvement—includes programs that support nontraditional programs that improve student achievement and attainment; supports the development of educational television and digital media programs targeted at preschool and early elementary school children and their families to promote early learning and school readiness, with a particular interest in reaching low-income children; and supports local educational agencies and their partners in implementing, evaluating, and refining tools and approaches for developing the non-cognitive skills of middle-grades students in order to increase student success.

English Language Acquisition—provides funds primarily by formula to states to improve services for English learners. Also provides funds to support national activities, including professional development to increase the supply of high-quality teachers of English learners and a national clearinghouse on English language acquisition.

Institute of Educational Sciences—provides funding to: support research, development, and dissemination activities that provide parents, teachers, and schools with evidence-based information on effective educational practices; support statistical data collection activities conducted by the National Center for Education Statistics; support the ongoing National Assessment of Educational Progress and the National Assessment Governing Board; support research to build the evidence base on improving special education and early intervention services and outcomes for infants, toddlers, and children with disabilities; and support studies, evaluations, and assessments related to IDEA.

NOTE 11. Statements of Budgetary Resources

The SBR compares budgetary resources with the status of those resources. As of September 30, 2018, budgetary resources were \$358.5 billion and net agency outlays were \$146.8 billion. As of September 30, 2017, budgetary resources were \$398.5 billion and net agency outlays were \$152.2 billion.

New Obligations Incurred and Upward Adjustments by Apportionment Type and Category (Dollars in Millions)

	2018	2017
DIRECT:		
Category A	\$ 2,320	\$ 2,186
Category B	314,446	360,781
Exempt from Apportionment	96	13
Total Direct Apportionment	316,862	362,980
REIMBURSABLE:		
Category A	4	3
Category B	60	55
New Obligations Incurred and Upward Adjustments	\$ 316,926	\$ 363,038

New obligations incurred and upward adjustments can be either direct or reimbursable. Reimbursable obligations are those financed by offsetting collections received in return for goods and services provided, while all other obligations are direct. The apportionment categories are determined in accordance with the guidance provided in OMB regulations. Category A apportionments are those resources that can be obligated in the current fiscal year without restriction on the purpose of the obligation, other than to be in compliance with legislation underlying programs for which the resources were made available. Category B apportionments are restricted by purpose for which obligations can be incurred. In addition, some resources are available without apportionment by OMB.

Unused Borrowing Authority (Dollars in Millions)

	2018	2017
Beginning Balance, Unused Borrowing Authority	\$ 58,701	\$ 60,991
Current Year Borrowing Authority	167,897	166,601
Funds Drawn from Treasury	(155,820)	(160,763)
Borrowing Authority Withdrawn	(8,026)	(8,128)
Ending Balance, Unused Borrowing Authority	\$ 62,752	\$ 58,701

The Department is given authority to draw funds from Treasury to finance the Direct Loan, FFEL, and other loan programs. Unused borrowing authority is a budgetary resource and is available to support obligations for these programs. The Department periodically reviews its borrowing authority balances in relation to its obligations, resulting in the withdrawal of unused amounts.

Undelivered Orders (Dollars in Millions)

	2018	
	Intragovernmental	With the Public
Unpaid	\$ 159	\$ 132,716
Paid	238	120
Undelivered Orders	\$ 397	\$ 132,836

	2017
Budgetary	\$ 52,390
Non-Budgetary	75,665
Undelivered Orders (Unpaid)	\$ 128,055

Undelivered orders represent the amount of goods and/or services ordered which have not been actually or constructively received. The paid amount includes any orders which may have been prepaid or advanced but for which delivery or performance has not yet occurred.

FY 2018 changes in OMB Circular A-136 included new requirements to provide a breakout of both unpaid and paid undelivered orders between Federal and With the Public. These new requirements were not applied retroactively to the FY 2017 amounts above.

Distributed Offsetting Receipts (Dollars in Millions)

	2018	2017
Negative Subsidies and Downward Re-estimates of Subsidies:		
Direct Loan Program	\$ 26,539	\$ 18,849
FFEL Program	236	370
Facilities Loan Programs	9	55
HEAL Program	8	18
Total Negative Subsidies and Downward Re-estimates	26,792	19,292
Other	578	270
Distributed Offsetting Receipts	\$ 27,370	\$ 19,562

The majority of the distributed offsetting receipts line item on the SBR represents amounts paid from the Direct Loan program and FFEL program financing accounts to Treasury General Fund receipt accounts for downward current fiscal year executed subsidy re-estimates and negative subsidies.

Reconciliation of SBR to *Budget of the United States Government*
(Dollars in Millions)

	Budgetary Resources	Obligations Incurred	Distributed Offsetting Receipts	Net Outlays
Combined Statements of Budgetary Resources	\$ 398,529	\$ 363,038	\$ 19,562	\$ 152,172
Expired Funds	(5,102)	(3,935)	-	-
FFEL Guaranty Agency Amounts Included in the President's Budget	7,266	7,276	-	-
Distributed Offsetting Receipts	-	-	-	19,562
Other	(5)	(3)	9	(3)
Budget of the United States Government¹	\$ 400,688	\$ 366,376	\$ 19,571	\$ 171,731

¹ Amounts obtained from the Appendix, *Budget of the United States Government, FY 2019*.

The FY 2020 *Budget of the United States Government* (President's Budget), which presents the actual amounts for the year ended September 30, 2018, has not been published as of the issue date of these financial statements. The FY 2020 President's Budget is scheduled for release in February 2019. The table above reconciles the FY 2017 SBR to the FY 2019 President's Budget (FY 2017 actual amounts) for budgetary resources, obligations incurred, distributed offsetting receipts, and net outlays.

Reconciling differences exist because the President's Budget excludes expired funds. Additionally, the President's Budget includes a public enterprise fund that reflects the gross obligations by the FFEL program for the estimated activity of the consolidated federal fund of the guaranty agencies. Ownership by the federal government is independent of the actual control of the assets. Since the actual operation of the federal fund is independent from the Department's direct control, budgetary resources and obligations incurred are estimated and disclosed in the President's Budget to approximate the gross activities of the combined federal fund. Amounts reported on the SBR for the federal fund are compiled by combining all guaranty agencies' annual reports to determine a net valuation amount for the federal fund.

NOTE 12. Reconciliation of Net Cost of Operations to Budget

(Dollars in Millions)

	2018	2017
RESOURCES USED TO FINANCE ACTIVITIES		
New Obligations Incurred and Upward Adjustments	\$ 316,926	\$ 363,038
Spending Authority from Offsetting Collections & Recoveries	(139,939)	(186,509)
Offsetting Receipts	(27,370)	(19,562)
Net Budgetary Resources Obligated	149,617	156,967
Imputed Financing From Costs Absorbed by Others	38	27
Other Financing Sources	(27,784)	(25,461)
Net Other Resources	(27,746)	(25,434)
Net Resources Used to Finance Activities	121,871	131,533
RESOURCES USED OR GENERATED FOR ITEMS NOT PART OF THE NET COST OF OPERATIONS		
(Increase)/Decrease in Budgetary Resources Obligated but Not Yet Provided	(4,941)	(3,777)
Resources that Fund Subsidy Re-estimates Accrued in Prior Period	(134)	(28,006)
Credit Program Collections	97,660	142,011
Acquisition of Fixed Assets	(1)	(10)
Acquisition of Net Credit Program Assets or Liquidation of Liabilities for Loan Guarantees	(170,208)	(171,770)
Resources from Non-Entity Activity	27,766	25,476
Net Resources That Do Not Finance the Net Cost of Operations	(49,858)	(36,076)
Net Resources Used to Finance the Net Cost of Operations	72,013	95,457
COMPONENTS OF THE NET COST OF OPERATIONS THAT WILL NOT REQUIRE OR GENERATE RESOURCES IN THE CURRENT PERIOD		
Change in Depreciation	5	1
Subsidy Amortization and Interest on the Liability for Loan Guarantees	26,353	23,953
Other	(5)	2
Total Components Not Requiring or Generating Resources	26,353	23,956
Increase in Annual Leave Liability	(3)	-
Accrued Re-estimates of Credit Subsidy Expense	17,954	134
Increase in Exchange Revenue Receivable from the Public	(36,792)	(35,155)
Accrued Interest with Treasury	-	1
Other (+/-)	-	(114)
Total Components Requiring or Generating Resources in Future Periods	(18,841)	(35,134)
Total Components That Will Not Require or Generate Resources in the Current Period	7,512	(11,178)
Net Cost of Operations	\$ 79,525	\$ 84,279

The reconciliation of net cost of operations to budget reconciles the resources used to finance activities, both those received through budgetary resources and those received through other means, with the net cost of operations on the statement of net cost. This reconciliation provides an explanation of the differences between budgetary and financial (proprietary) accounting, as required by FASAB Standard No. 7, *Accounting for Revenue and Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting*.

Resources used to finance activities (section one) are reconciled with the net cost of operations by: (a) excluding resources used or generated for items not part of the net cost of operations (section two); and (b) including components of the net cost of operations that will not require or generate resources in the current period (section three). The primary resources used to finance activities that do not fund the net cost of operations include the acquisition of net credit program assets, the liquidation of liabilities for loan guarantees, and subsidy re-estimates accrued in the prior period. Significant components of the net cost of operations that will not generate or use resources in the current period include subsidy amortization, interest on the liability for loan guarantees, and increases in exchange revenue receivable from the public.

NOTE 13. Commitments and Contingencies

The Department discloses contingencies where any of the conditions for liability recognition are not met and there is at least a reasonable possibility that a loss or an additional loss may have been incurred in accordance with FASAB Standard No. 5, *Accounting for Liabilities of the Federal Government*. The following commitments are amounts for contractual arrangements that may require future financial obligations.

Future Minimum Lease Payments (Dollars in Millions)

2018		2017	
FY	Amount	FY	Amount
2019	\$ 73	2018	\$ 73
2020	73	2019	77
2021	77	2020	79
2022	81	2021	81
2023	82	2022	85
After 2023	83	After 2022	86
Total	\$ 469	Total	\$ 481

The Department leases from the General Services Administration all or a portion of 17 privately owned and 12 publicly owned buildings in 20 cities. The table above presents the estimated future minimum lease payments for these privately and publicly owned buildings.

GUARANTY AGENCIES

The Department may assist guaranty agencies experiencing financial difficulties. The Department has not done so in fiscal years 2018 or 2017 and does not expect to in future years. No provision has been made in the financial statements for potential liabilities.

FEDERAL PERKINS LOAN PROGRAM

The Federal Perkins Loan program provides financial assistance to eligible postsecondary school students. In FY 2018, the Department provided funding of 83.2 percent of the capital used to make loans to eligible students through participating schools at 5 percent interest. The schools provided the remaining 16.8 percent of program funding. For the latest academic year that ended June 30, 2018, approximately 356 thousand loans were made totaling

\$886.3 million at 1,272 institutions, making an average of \$2,491 per loan. The Department’s equity interest was approximately \$6.3 billion as of June 30, 2018.

Federal Perkins Loan program borrowers who meet statutory eligibility requirements—such as those who provide service as teachers in low-income areas or as Peace Corps or AmeriCorps VISTA volunteers, as well as those who serve in the military, law enforcement, nursing, or family services—may receive partial loan forgiveness for each year of qualifying service.

The Federal Perkins Loan program was scheduled to officially end on September 30, 2015. However, the program was extended through September 30, 2017 by the *Federal Perkins Loan Program Extension Act of 2015* (Extension Act). The Extension Act eliminated the Perkins Loan grandfathering provisions that the Department had put in place, and establishes new eligibility requirements for undergraduate and graduate students to receive Perkins Loans. As of September 30, 2017, the Department is no longer authorized to make new Perkins Loans.

LITIGATION AND OTHER CLAIMS

The Department is involved in various lawsuits incidental to its operations. In the opinion of management, the ultimate resolution of pending litigation will not have a material impact on the Department’s financial position.

The cost of loan forgiveness related to borrower defense claims reflected in the accompanying financial statements is limited to loans originated through September 30, 2018. The final disposition of claims filed and those yet to be filed from loans originated before September 30, 2018, is not expected to have a material impact on these financial statements.

OTHER MATTERS

Some portion of the current-year financial assistance expenses (grants) may include funded recipient expenditures that are subsequently disallowed through program review or audit processes. In the opinion of management, the ultimate disposition of these matters will not have a material effect on the Department’s financial position.

United States Department of Education Combining Statement of Budgetary Resources
For the Year Ended September 30, 2018
(Dollars in Millions)
(Unaudited)

	Federal Student Aid	
	Budgetary	Non-Budgetary Credit Reform Financing Accounts
BUDGETARY RESOURCES		
Unobligated Balance from Prior Year Budget Authority (Net)	\$ 12,015	\$ 15,859
Appropriations (Discretionary and Mandatory)	48,627	-
Borrowing Authority (Discretionary and Mandatory) (Note 11)	-	167,543
Spending Authority from Offsetting Collections (Discretionary and Mandatory)	393	61,439
Total Budgetary Resources	\$ 61,035	\$ 244,841
Memorandum (non-add) entries:		
Net adjustments to unobligated balance brought forward, Oct. 1	\$ 901	\$ (7,024)
STATUS OF BUDGETARY RESOURCES		
New Obligations Incurred and Upward Adjustments (Total) (Note 11)	\$46,002	\$221,384
Unobligated Balance, End of Year:		
Apportioned, Unexpired Accounts	12,290	-
Unapportioned, Unexpired Accounts	2,168	23,457
Unexpired Unobligated Balance, End of Year	\$ 14,458	\$ 23,457
Expired Unobligated Balance, End of Year	575	-
Unobligated Balance, End of Year (Total)	\$ 15,033	\$ 23,457
Total Status of Budgetary Resources	\$ 61,035	\$ 244,841
OUTLAYS, NET		
Outlays, Net (Discretionary and Mandatory)	45,918	83,059
Distributed Offsetting Receipts (-) (Note 11)	(27,321)	-
Agency Outlays, Net (Discretionary and Mandatory) (Note 11)	\$ 18,597	\$ 83,059

Office of Elementary and Secondary Education		Office of Special Education and Rehabilitative Services		Other		Combined		Total
Budgetary	Budgetary	Budgetary	Non-Budgetary Credit Reform Financing Accounts	Budgetary	Non-Budgetary Credit Reform Financing Accounts	Budgetary	Non-Budgetary Credit Reform Financing Accounts	
\$ 419	\$ 306	\$ 546	\$ 4	\$ 13,286	\$ 15,863	\$ 29,149		
26,082	16,954	7,678	-	99,341	-	99,341		
-	-	-	354	-	167,897	167,897		
(7)	-	65	227	451	61,666	62,117		
\$ 26,494	\$ 17,260	\$ 8,289	\$ 585	\$ 113,078	\$ 245,426	\$ 358,504		
\$ 214	\$ (5)	\$ (102)	\$ (326)	\$ 1,008	\$ (7,350)	\$ (6,342)		
\$ 24,617	\$ 16,959	\$ 7,650	\$ 314	\$ 95,228	\$ 221,698	\$ 316,926		
1,828	16	361	-	14,495	-	14,495		
-	-	6	271	2,174	23,728	25,902		
\$ 1,828	\$ 16	\$ 367	\$ 271	\$ 16,669	\$ 23,728	\$ 40,397		
49	285	272	-	1,181	-	1,181		
\$ 1,877	\$ 301	\$ 639	\$ 271	\$ 17,850	\$ 23,728	\$ 41,578		
\$ 26,494	\$ 17,260	\$ 8,289	\$ 585	\$ 113,078	\$ 245,426	\$ 358,504		
21,536	16,318	7,308	41	91,080	83,100	174,180		
-	-	(49)	-	(27,370)	-	(27,370)		
\$ 21,536	\$ 16,318	\$ 7,259	\$ 41	\$ 63,710	\$ 83,100	\$ 146,810		

United States Department of Education Combining Statement of Budgetary Resources
For the Year Ended September 30, 2017
(Dollars in Millions)
(Unaudited)

	Federal Student Aid	
	Budgetary	Non-Budgetary Credit Reform Financing Accounts
BUDGETARY RESOURCES		
Unobligated Balance from Prior Year Budget Authority (Net)	\$ 14,064	\$ 10,389
Appropriations (Discretionary and Mandatory)	88,321	-
Borrowing Authority (Discretionary and Mandatory) (Note 11)	-	166,426
Spending Authority from Offsetting Collections (Discretionary and Mandatory)	1,037	68,906
Total Budgetary Resources	\$ 103,422	\$ 245,721
Memorandum (non-add) entries:		
Net adjustments to unobligated balance brought forward, Oct. 1	\$ 3,680	\$ (4,914)
STATUS OF BUDGETARY RESOURCES		
New Obligations Incurred and Upward Adjustments (Total) (Note 11)	\$ 92,308	\$ 222,838
Unobligated Balance, End of Year:		
Apportioned, Unexpired Accounts	8,595	-
Unapportioned, Unexpired Accounts	2,093	22,883
Unexpired Unobligated Balance, End of Year	\$ 10,688	\$ 22,883
Expired Unobligated Balance, End of Year	426	-
Unobligated Balance, End of Year (Total)	\$ 11,114	\$ 22,883
Total Status of Budgetary Resources	\$ 103,422	\$ 245,721
OUTLAYS, NET		
Outlays, Net (Discretionary and Mandatory)	84,986	40,490
Distributed Offsetting Receipts (-) (Note 11)	(19,438)	-
Agency Outlays, Net (Discretionary and Mandatory) (Note 11)	\$ 65,548	\$ 40,490

Office of Elementary and Secondary Education		Office of Special Education and Rehabilitative Services		Other		Combined		Total
Budgetary	Budgetary	Budgetary	Non-Budgetary Credit Reform Financing Accounts	Budgetary	Non-Budgetary Credit Reform Financing Accounts	Budgetary	Non-Budgetary Credit Reform Financing Accounts	
\$ 1,312	\$ 330	\$ 1,011	\$ 169	\$ 16,717	\$ 10,558	\$ 27,275		
22,197	16,582	7,288	-	134,388	-	134,388		
-	-	-	175	-	166,601	166,601		
-	-	59	263	1,096	69,169	70,265		
\$ 23,509	\$ 16,912	\$ 8,358	\$ 607	\$ 152,201	\$ 246,328	\$ 398,529		
\$ 399	\$ 169	\$ 77	\$ (7)	\$ 4,325	\$ (4,921)	\$ (596)		
\$ 23,304	\$ 16,601	\$ 7,710	\$ 277	\$ 139,923	\$ 223,115	\$ 363,038		
144	2	271	-	9,012	-	9,012		
-	-	7	330	2,100	23,213	25,313		
\$ 144	\$ 2	\$ 278	\$ 330	\$ 11,112	\$ 23,213	\$ 34,325		
61	309	370	-	1,166	-	1,166		
\$ 205	\$ 311	\$ 648	\$ 330	\$ 12,278	\$ 23,213	\$ 35,491		
\$ 23,509	\$ 16,912	\$ 8,358	\$ 607	\$ 152,201	\$ 246,328	\$ 398,529		
22,505	16,233	7,550	(30)	131,274	40,460	171,734		
-	-	(124)	-	(19,562)	-	(19,562)		
\$ 22,505	\$ 16,233	\$ 7,426	\$ (30)	\$ 111,712	\$ 40,460	\$ 152,172		

REQUIRED SUPPLEMENTARY STEWARDSHIP INFORMATION (UNAUDITED)

OMB requires each federal agency to report on its stewardship over various resources entrusted to it and certain responsibilities assumed by it that cannot be measured and conveyed through traditional financial reports. These elements do not meet the criteria for assets and liabilities required in the preparation of the Department's financial statements and accompanying footnotes, but are nonetheless important to understanding the agency's financial condition, strategic goals, and related program outcomes.

STEWARDSHIP EXPENSES

Stewardship expenses are substantial investments made by the federal government for the long-term benefit of the nation. Because costs of stewardship resources are treated as expenses in the financial statements in the year the costs are incurred, they are reported as Required Supplementary Stewardship Information to highlight their benefit and to demonstrate accountability for their use.

In the United States, the structure of education finance is such that state and local governments play a much greater overall role than the federal government. Of the estimated more than \$1 trillion spent nationally on all levels of education, the majority of funding comes from state, local, and private sources. In the area of elementary and secondary education, nearly 90 percent of resources come from nonfederal sources. These funds serve over 50 million students enrolled in public, public charter, and private schools in the United States and its territories, according to the National Center for Education Statistics.

With its relatively small role in total education funding, the Department strives to create the greatest number of favorable program outcomes with a limited amount of taxpayer-provided resources. This is accomplished by targeting areas in which funds will go the furthest in doing the most good. Accordingly, federal funding is used to provide grant, loan, loan-forgiveness, work-study, and other assistance to more than 20 million postsecondary students. The majority of the Department's \$298.6 billion in gross outlays during FY 2018 was attributable

to Direct Loan disbursements administered by FSA. Grant-based activity under discretionary, formula, and need-based formats primarily accounted for the remainder of the outlays.

Discretionary grants, such as the Federal TRIO Programs and the Teacher Incentive Fund, are awarded on a competitive basis. When funds for these grants are exhausted, they cease to be funded. The Department reviews discretionary grant applications using:

- a formal review process for selection,
- both legislative and regulatory requirements, and
- published selection criteria established for individual programs.

Formula grants, such as Title I and Title III of the *Elementary and Secondary Education Act*, are not competitive. The majority go to school districts, as often as annually, on a formula basis, and they:

- provide funds as dictated by a law, and
- allocate funds to districts on a per-student basis.

Need-based grants, including the Pell Grant, Federal Work Study, and the Federal Supplemental Educational Opportunity Grant, are based on family income and economic eligibility. While there are many state, institutionally (college or school), and privately sourced need-based grants, most need-based grants are funded by the federal government where the financial aid formula is determined by a combination of factors, including:

- family income and discretionary assets,
- expected family contribution, and
- dependency status of the student and other members of their family.

Further details on financial figures and program-level goals can be viewed in the Department's **2018 Budget Summary**.

INVESTMENT IN HUMAN CAPITAL

Human capital investments are defined similarly by OMB, in Circular A-136, and the Statement of Federal Financial Accounting Standards No. 8, *Supplementary Stewardship Reporting*. These investments are expenses included in net cost for education and training programs intended to increase or maintain national economic productive capacity and produce outputs and outcomes that provide evidence of maintaining or increasing national productive capacity.

Supplementing state and local government funding, the Department utilizes its annual appropriations and outlay authority to foster human capital improvements across the nation by supporting programs along the entire spectrum of education. Direct loans, guaranteed loans, grants, and technical program assistance are administered and monitored by FSA and numerous other program-aimed components of the Department. The Institute of Education Sciences is the independent nonpartisan research arm of the Department that aims to present scientific evidence to ground education practice and policy while providing useful information to all stakeholders in the arena of American education. Further details of the major offices/programs applicable to this section are described below:

Federal Student Aid. Federal Student Aid is the part of the Department that administers need-based financial assistance programs for students pursuing postsecondary education and makes federal grants, direct loans, guaranteed loans, and work-study funding available to eligible undergraduate and graduate students.

Federal Student Aid's programs link the overall initiatives of the Department in enhancing education—a fundamental stepping-stone to higher living standards for American citizens. While education is vital to national economic growth, education's contribution is more than increased productivity and incomes. Education improves health, promotes social change, and opens doors to a better future for children and adults.

Direct Loan Subsidy. The William D. Ford Federal Direct Loan (Direct Loan) program is a direct-lending program in which loan capital is provided to students by the federal government through borrowings from the United States (U.S.) Department of Treasury.

Federal Family Education Loan (FFEL) Program Subsidy. The FFEL Loan program has originated no new loans since June 30, 2010; however, its permanent

budget authority allows it to continue to operate with state and private nonprofit guaranty agencies to honor loan guarantees and for the Department to pay interest supplements on outstanding loans by private lenders to eligible students. The FFEL Loan program expenses include the Loan Participation Purchase, Loan Purchase Commitment, and ABCP Conduit expenses.

Perkins Loans, Pell and Other Grants. Perkins Loan and Grant programs include the Pell Grant program that awards direct grants through participating institutions to undergraduate students with financial need. Participating institutions either credit the appropriated funds to the student's school account or pay the student directly once per term.

The Teacher Education Assistance for College and Higher Education (TEACH) Grant Program. The TEACH Grant program awards annual grants to students who agree to teach in a high-need subject area in a public or private elementary or secondary school that serves low-income students. If the students do not satisfy their agreement to serve, the grants are converted to Direct Unsubsidized Loans.

Office of Elementary and Secondary Education (OESE). OESE promotes academic excellence, enhances educational opportunities and equity for all of America's children and families, and improves quality of teaching and learning by providing leadership, technical assistance, and financial support.

Office of Special Education and Rehabilitative Services (OSERS). OSERS is committed to the broad values of Inclusion, Equity and Opportunity for infants, toddlers, children, youth, and adults with disabilities to actively participate in all aspects of life. OSERS promotes inclusion, ensures equity and creates opportunity as it strives to improve results and outcomes for children and adults with disabilities. By providing funding to programs that serve infants, toddlers, children, and adults with disabilities, OSERS works to ensure that these individuals are fully included in school, in employment, and in life. OSERS also provides funds to programs that offer information and technical assistance to parents of infants, toddlers and children with disabilities, as well as members of the learning community who serve these individuals.

The following table illustrates the Department's expenses paid for bolstering the nation's human capital, broken out by the nature of the expense, for the last five years.

PROGRAM OUTCOMES

Favorable results in the various programs administered by the Department can be interpreted in many ways. Accordingly, the effectiveness of the Department’s investments in human capital can be gauged by changes in the number of students who fully complete the requirements for earning a bachelor’s or associate’s degree. This often final stepping stone in one’s educational career correlates strongly with wage and/or salary increases due to the high-level skills expected by employers of graduates entering the labor force. Attaining a degree has proven to increase an individual’s job opportunity outlook for

life, making them less susceptible to general economic downturns and allowing them to afford living expenses more comfortably; make debt payments, including student loans; and avoid delinquency and credit problems. Increased employability makes Americans more competitive in the global labor market, yielding lower unemployment, higher economic well-being, and greater national security.

One important method used in the area of analyzing student loan programs, borrower activity, and institution participation is the monitoring of default statistics. Each year, substantial stewardship expenses incurred

Table 2. Summary of Human Capital Expenses
(Dollars in Millions)

	2018	2017	2016	2015	2014
FEDERAL STUDENT AID EXPENSE					
Direct Loan Subsidy	\$ 4,369	\$ 5,329	\$ 16,119	\$ (892)	\$ 8,126
Federal Family Education Loan Program Subsidy	1,228	3,411	10,234	(3,856)	(6,585)
Perkins Loans, Pell and Other Grants	28,512	28,770	30,671	31,400	33,098
Program Operational Costs	246	224	308	242	206
Subtotal	34,355	37,734	57,332	26,894	34,845
DEPARTMENTAL PROGRAMS					
Elementary and Secondary Education	20,625	22,420	22,155	22,146	22,832
Special Education and Rehabilitative Services	16,548	16,294	15,944	15,751	15,948
Other Departmental Programs	6,367	6,565	6,349	6,494	6,938
Program Operational Costs	459	419	625	511	667
Subtotal	43,999	45,698	45,073	44,902	46,385
Grand Total	\$ 78,354	\$ 83,432	\$ 102,405	\$ 71,796	\$ 81,230

Figure 13. Federal Student Aid Investments in Human Capital, FY 2018

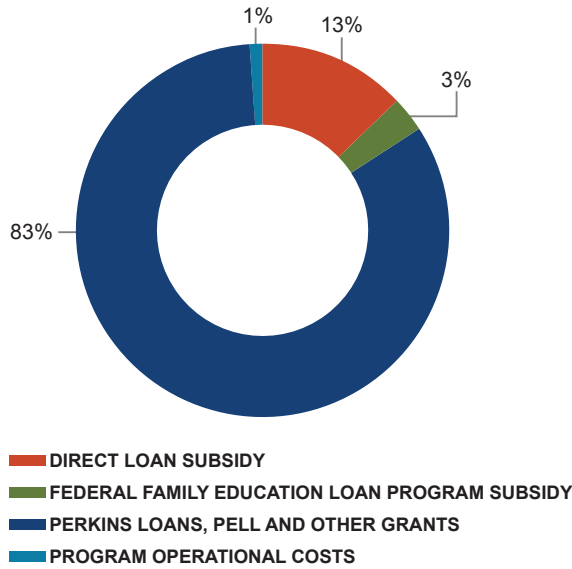
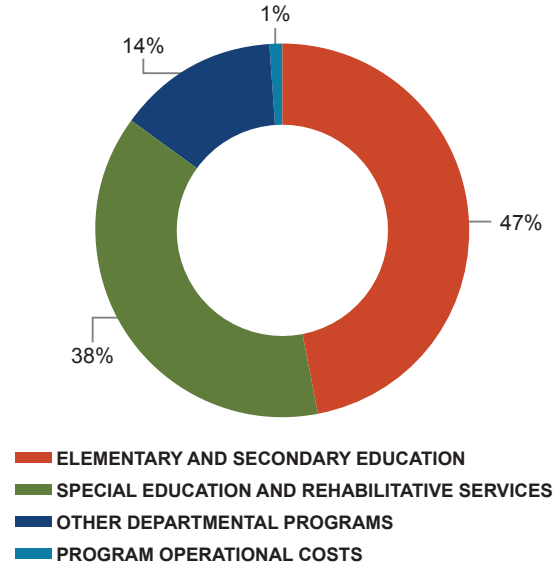


Figure 14. Departmental Program Investments in Human Capital, FY 2018



by the Department are aimed at lowering the number of defaulted loans, defaulted borrowers, and disbursed dollars going into default. This is done because every default—when a loan payment is missed for multiple months—results in loan funds that are not replenished, missed opportunities to invest in other degree-seeking human capital and additional resources used by the government in attempting to collect its money. Each aspect of a default costs American taxpayers, affects the federal budget, decreases economic well-being, and harms borrowers’ credit scores.

Although a direct and proven linkage does not exist between the two variables, the Department feels strongly about its ability to mitigate the risk of default through various efforts. Stewardship expenses for this postsecondary goal include those incurred to increase borrower awareness of repayment options, encouraging third-party loan servicers to work more effectively in helping students avoid default by devising viable repayment plans, and by working with financial aid offices around the country to help them improve the loan counseling provided to students who have yet to graduate or enter repayment.

Default statistics for the FY 2015 cohort of borrowers entering repayment were released at the end of FY 2018. Of the 4.9 million borrowers entering repayment from October 1, 2014, to September 30, 2015, 532,000 defaulted on their loan before September 30, 2017. This borrower default rate of 10.8 percent across all institution types showed a decrease from the prior year rate of 11.5 percent for the 2014 cohort. It is important to note that this metric is unadjusted for loan program facets, such as consolidations and forbearance.

Trends in default rates, among other indicating metrics monitored at the Department, continue to support proof of favorable outcomes within programs at all levels.

REPORT OF THE INDEPENDENT AUDITORS



UNITED STATES DEPARTMENT OF EDUCATION OFFICE OF INSPECTOR GENERAL

THE INSPECTOR GENERAL

November 15, 2018

The Honorable Betsy DeVos
Secretary of Education
Washington, D.C. 20202

Dear Secretary DeVos:

The enclosed report presents the results of the audit of the U.S. Department of Education's (Department) financial statements for fiscal year 2018 to comply with the Chief Financial Officers Act of 1990, as amended. The report should be read in conjunction with the Department's financial statements and notes to fully understand the context of the information contained therein.

We contracted with the independent certified public accounting firm KPMG LLP to audit the financial statements of the Department as of September 30, 2018, and for the year then ended. The contract requires that the audit be performed in accordance with U.S. generally accepted government auditing standards and Office of Management and Budget bulletin, *Audit Requirements for Federal Financial Statements*.

Results of the Independent Audit

KPMG found:

- The fiscal year 2018 financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America;
- One material weakness in internal control over financial reporting:
 - Controls over the Reliability of Information Used in the Modeling Activities Need Improvement;
- One significant deficiency in internal control over financial reporting:
 - Information Technology Controls Need Improvement; and
- One instance of reportable noncompliance with Federal law related to referring delinquent student loan debts to Treasury.

400 MARYLAND AVENUE, S.W., WASHINGTON, DC 20202-1510

Promoting the efficiency, effectiveness, and integrity of the Department's programs and operations.

Page 2 – The Honorable Betsy DeVos

KPMG is responsible for the attached auditors' report dated November 15, 2018, and the conclusions expressed therein. We do not express opinions on FSA's financial statements or internal control over financial reporting, or conclusions on compliance and other matters.

We appreciate the cooperation given KPMG and my office during the audit. If you have any questions or would like to discuss the report, please contact me at (202) 245-6900.

Sincerely,

A handwritten signature in black ink that reads "Kathleen S. Tighe". The signature is written in a cursive style with a large initial 'K' and a long horizontal stroke at the end.

Kathleen S. Tighe
Inspector General

Enclosure



KPMG LLP
 Suite 12000
 1801 K Street, NW
 Washington, DC 20006

Independent Auditors' Report

Inspector General
 United States Department of Education

Secretary
 United States Department of Education:

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of the United States Department of Education (Department), which comprise the consolidated balance sheet as of September 30, 2018, and the related consolidated statements of net cost, and changes in net position, and combined statement of budgetary resources for the year then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

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

Auditors' Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America, in accordance with the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, and in accordance with Office of Management and Budget (OMB) Bulletin No. 19-01, *Audit Requirements for Federal Financial Statements*. Those standards and OMB Bulletin No. 19-01 require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

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

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



Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of the United States Department of Education as of September 30, 2018, and its net cost, changes in net position, and budgetary resources for the year then ended in accordance with U.S. generally accepted accounting principles.

Other Matters

Accompanying Prior Period Financial Statements

The accompanying consolidated financial statements of the Department as of September 30, 2017 and for the year then ended were audited by other auditors whose report thereon dated November 13, 2017 expressed an unmodified opinion on those financial statements before the reclassifications described in Note 1 to the consolidated financial statements. As described in Note 1, to conform to fiscal year 2018 financial reporting requirements contained in OMB Circular A-136, *Financial Reporting Requirements*, the Department made the following reclassifications to the fiscal year 2017 consolidated financial statements and notes:

- The Combined Statement of Budgetary Resources was condensed to present budgetary resources, status of budgetary resources, and net outlays, while removing the presentation of the change in obligated balance.
- Note 6, Liabilities Not Covered by Budgetary Resources, was expanded to include the presentation of liabilities not requiring budgetary resources.

As part of our audit of the 2018 consolidated financial statements, we also audited the reclassifications described in Note 1 that were applied to reclassify the 2017 consolidated financial statements. In our opinion, such reclassifications are appropriate and have been properly applied. We were not engaged to audit, review, or apply any procedures to the 2017 consolidated financial statements of the Department other than with respect to the reclassifications and, accordingly, we do not express an opinion or any other form of assurance on the 2017 consolidated financial statements as a whole.

Interactive Data

Management has elected to reference to information on websites or other forms of interactive data outside the *Agency Financial Report* to provide additional information for the users of its financial statements. Such information is not a required part of the basic consolidated financial statements or supplementary information required by the Federal Accounting Standards Advisory Board. The information on these websites or the other interactive data has not been subjected to any of our auditing procedures, and accordingly we do not express an opinion or provide any assurance on it.

Required Supplementary Information

U.S. generally accepted accounting principles require that the information in the Management's Discussion and Analysis, Required Supplementary Information, and Required Supplementary Stewardship Information sections be presented to supplement the basic consolidated financial statements. Such information, although not a part of the basic consolidated financial statements, is required by the Federal Accounting Standards Advisory Board who considers it to be an essential part of financial reporting for placing the basic consolidated 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 consolidated financial statements, and other knowledge we obtained during our audit of the basic consolidated financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.



Other Information

Our audit was conducted for the purpose of forming an opinion on the basic consolidated financial statements as a whole. The information on pages i through iii, Message from the Secretary, information on pages 28 and 29, Other Information Section, and Appendices are presented for purposes of additional analysis and are not a required part of the basic consolidated financial statements. Such information has not been subjected to the auditing procedures applied in the audit of the basic consolidated financial statements, and accordingly, we do not express an opinion or provide any assurance on it.

Other Reporting Required by Government Auditing Standards

Internal Control over Financial Reporting

In planning and performing our audit of the consolidated financial statements as of and for the year ended September 30, 2018, we considered the Department's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the consolidated financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Department's internal control. Accordingly, we do not express an opinion on the effectiveness of the Department's internal control. We did not test all internal controls relevant to operating objectives as broadly defined by the *Federal Managers' Financial Integrity Act of 1982*.

Our consideration of internal control was for the limited purpose described in the preceding paragraph 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 have not been identified. However, as described in the accompanying exhibits, we did identify certain deficiencies in internal control that we consider to be a material weakness and a significant deficiency.

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. We consider the deficiencies described in Exhibit A, *Controls over the Reliability of Information Used in the Modeling Activities Need Improvement*, to be a material weakness.

Department management did not report the material weakness, *Controls over the Reliability of Information Used in the Modeling Activities Need Improvement*, in its *Statement of Assurance*, included in the Management's Discussion and Analysis section of the accompanying *Agency Financial Report*.

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. We consider the deficiencies described in Exhibit B, *Information Technology Controls Need Improvement*, to be a significant deficiency.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Department's consolidated 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 determination of financial statement amounts. 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 an instance of noncompliance or other matters that are required to be reported under *Government Auditing Standards* or OMB Bulletin No. 19-01, and which is described in Exhibit C, *Requirement for Referring Delinquent Student Loan Debts to Treasury*.



We also performed tests of its compliance with certain provisions referred to in Section 803(a) of the *Federal Financial Management Improvement Act of 1996* (FFMIA). Providing an opinion on compliance with FFMIA was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances in which the Department's financial management systems did not substantially comply with the (1) Federal financial management systems requirements, (2) applicable Federal accounting standards, and (3) the United States Government Standard General Ledger at the transaction level.

The Department's Responses to Findings

The Department's responses to the findings identified in our audit are described in Exhibit D. The Department's responses were not subjected to the auditing procedures applied in the audit of the consolidated financial statements and, accordingly, we express no opinion on the responses.

Purpose of the Other Reporting Required by Government Auditing Standards

The purpose of the communication described in the Other Reporting Required by *Government Auditing Standards* section 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 Department's internal control or compliance. Accordingly, this communication is not suitable for any other purpose.

KPMG LLP

Washington, D.C.
November 15, 2018

Material Weakness**Controls over the Reliability of Information Used in the Modeling Activities Need Improvement**

Under the *Federal Credit Reform Act of 1990* (FCRA), the Department of Education (the Department) is required to perform periodic interest rate and technical re-estimates of the subsidy costs of its direct loan and guaranty programs. These re-estimates are calculated using an internally-developed cash flow model performed by the Department's Cost Estimation and Analysis Division (CEAD). The cash flow model utilizes assumptions based on sourced data elements from the National Student Loan Data System (NSLDS) that are updated at different intervals by third parties (servicers, guaranty agencies, etc.) and certain assumptions provided by the Office of Management and Budget (OMB). These future cash flow outputs generated from the Department's Student Loan Model (SLM) are then input into OMB's Credit Subsidy Calculator (CSC), as required by U.S. generally accepted accounting principles to generate subsidy re-estimates.

Conditions:**Credit Reform Student Loan Model Documentation and Analysis**

We noted that management's documentation detailing the models currently in use including methodologies and/or considerations used to calculate the assumptions could be improved. Such improvements could provide sufficient details to enable an independent reviewer to effectively assess the reasonableness of key decisions made regarding critical elements of the re-estimate computations and the potential impact on the financial statements. We also noted that management's analysis of the reestimate results identified material differences which are expected to reverse over time, however such analysis was not clearly documented to support management's consideration of the effect of such differences, if any, on the fair presentation of direct loans in accordance with accounting standards. We found the following areas where specific documentation could be improved:

- CEAD produces a model inventory which includes all model assumptions, however it does not specify which assumptions are key. The model inventory includes summarized information on inputs supporting the assumptions, however it does not identify the specific data elements related to each input;
- CEAD's sensitivity analysis should be expanded to include a documented evaluation of which assumptions are key to the estimation model; and
- CEAD's management review controls should be documented at a sufficient level of detail to demonstrate the level of precision used in management's analysis and the evaluation of estimation uncertainty on the fair presentation of the financial statements and related footnotes in accordance with accounting standards.

Controls over the Completeness and Accuracy of Data Elements used in the Student Loan Model

The assumptions used in SLM are developed by utilizing certain data elements of direct and guaranty loans extracted from the NSLDS such as loan identifier, loan type, origination date, net amount disbursed, and repayment plan type, among many others.

We noted that management's processes, procedures, and controls should be improved to provide sufficient detail over procedures and controls that specifically address the evaluation of the completeness and accuracy of data elements from NSLDS used to develop model assumptions.

NSLDS Oversight of Loan Guaranty Balances

Under the Federal Family Education Loan (FFEL) guaranty loan program, private lenders provide federally guaranteed student loans to parents and students. The FFEL program began in 1965 and ran until 2010. Student loan data from schools, guaranty agencies, the direct loan program, and other Department programs are stored in the NSLDS.

Financial institutions, servicers, and guaranty agencies have up to 90 days after year-end to report guaranteed loan data to NSLDS. Therefore, such information may not be updated until December 31 each year. To determine the balance of loan guarantees at the end of each fiscal year, the Department executes a query in NSLDS in October. The Department utilizes this information sourced from NSLDS to develop financial statement note disclosures related to the performing FFEL program guaranty loans, including the principal balance outstanding and maximum government exposure. In addition, the exposure information is used in the estimation methodology related to the liability for loan guarantees.

We noted that management did not design and implement effective controls to ensure that the NSLDS query extracts related to the total exposure amount for loan guarantees with private lenders were complete and accurate. For example, specific controls over the completeness and accuracy of these queries, including how timing differences are resolved, were not evidenced in management's internal control processes.

Cause/Effect:

The Department's documentation was not at a sufficient level of detail to enable an independent reviewer to properly assess the reasonableness of management's reestimate modeling practices to include processes; specific controls; information used; and key judgments determined by management as part of the reestimate methodologies utilized for financial reporting purposes. We noted that while there are controls related to the accounting and reporting of loan programs, such controls are not designed at a sufficient level of precision to demonstrate the assessment and evaluation of the completeness and accuracy of data used in the SLM assumptions and relevant financial statement disclosures.

The reestimate processes and controls at the Department form an integral part of the financial reporting process, which impact the most significant estimates and related balances in the financial statements and related footnotes. As a result, weaknesses in processes, procedures, and controls in the areas described above impact management's ability to prevent, detect, and correct errors in the re-estimate process, which could lead to a material misstatement of the financial statements.

Criteria:

The following criteria were considered in the evaluation of the material weakness presented in this exhibit:

- *Green Book* (GAO-14-704G – Federal Internal Control Standards), Section OV3.05, Section OV4.08, Principle 10.03, Section 12.03, Section 13.04
- FASAB Technical Release 6, *Preparing Estimates for Direct Loan and Loan Guarantee Subsidies under the Federal Credit Reform Act – Amendments to Technical Release No. 3 Preparing and Auditing Direct Loan and Loan Guarantee Subsidies under the Federal Credit Reforms Act*, Paragraphs 17, 20, 23, 27, 38 and 40
- SFFAS 2, *Accounting for Direct Loans and Loan Guarantees*, Paragraphs 22 and 23

Recommendations:

1. With respect to the SLM documentation and analysis, we recommend that the Department management:
 - a. Coordinate among the various groups at the FSA and CEAD to determine, each year, what key assumptions and data elements will be used in the Credit Reform re-estimate calculations. These determinations should be fully documented to enable a reviewer to understand and re-perform procedures, as needed.
2. With respect to model estimation uncertainty, we recommend that the Department and FSA management:
 - a. Ensure that sufficient documentation is maintained evidencing management's analysis and consideration of the effects of model estimation uncertainty on the fair presentation of the financial statements and related note disclosure reestimates in accordance with accounting standards.
3. With respect to the completeness and accuracy of the data elements used in the SLM, we recommend that the Department management:
 - a. Work with FSA to validate that appropriate data elements are extracted from NSLDS.
4. We recommend that the FSA management:
 - a. Enhance existing documentation and controls to demonstrate the relationship between the key data elements used in the estimation model assumptions and the controls over student loan transactions at FSA.
5. With respect to the NSLDS oversight of loan guaranty balances, we recommend that the Department and FSA management:
 - a. Develop, implement, and document controls to assess the reasonableness of the principal balance outstanding and maximum government exposure amounts presented in the financial statement footnotes and used in calculating the liability for loan guarantees.
 - b. Enhance the query process documentation to demonstrate the completeness and accuracy of the NSLDS query for the performing FFEL loan principal balance outstanding and maximum government exposure.
 - c. Develop, implement, and document a sensitivity analysis related to NSLDS queries of September 30 balances considering the potential timing differences in the data being used for financial reporting.

Exhibit B

Significant Deficiency**Information Technology Controls Need Improvement****Condition:**

During fiscal year 2018, we noted information technology (IT) control deficiencies related to logical access in the Department's network and in one application system managed by the Department and access and change control in two application systems managed by the FSA, as follows:

- Weaknesses in the Department's IT controls related to the removal of separated users' access from the network and one of its applications;
- Weaknesses in FSA's IT controls related to the review and recertification of system access. Specifically, the access reviews did not cover all users for one of the FSA systems. Additionally, for two FSA systems, the access lists provided by the contractors to perform the periodic access reviews were not verified for completeness and accuracy; and
- Weaknesses in FSA's IT controls related to the segregation of duties. For example, in one FSA system, the developers retained greater than read-only access to the application in the production environment.

Additionally, we noted weaknesses related to program development, where evidence of data validation upon system migration to a new data center was not available.

Additionally, in FY 2017, the predecessor auditor reported a significant deficiency related to the Department and FSA internal control environments due to persistent unmitigated IT control deficiencies. During FY 2018, the Department and FSA management demonstrated progress addressing some of these long-standing deficiencies. However, management has not fully remediated prior year weaknesses related to logical access administration, user access removal, user access reviews, and recertification and system configuration management. Due to the nature of these control deficiencies, the Department and FSA management continue to implement corrective actions to remediate these control deficiencies. The continued existence of these deficiencies reduces managements' ability to effectively manage information system risks.

Cause/Effect:

These IT control deficiencies existed because (1) the Department and FSA did not consistently adhere to its documented agency-wide policies and procedures and NIST requirements consistently for systems hosted and managed by the Department and FSA or by service organizations; (2) certain Department and FSA policies and procedures did not require the documentation and maintenance of supporting control documentation and review of evidence; and (3) the Department and FSA did not fully implement their corrective actions to remediate prior-year conditions and associated causes. Furthermore, separated user access deficiencies resulted due to the lack of timely notification of user separations by internal departments.

Ineffective IT controls increases the risk of unauthorized use, disclosure, disruption, modification, or destruction of information and information systems that could impact the integrity and reliability of information processed in the associated applications which may lead to misstatements of the financial statements.

Criteria:

The following criteria were considered in the evaluation of the significant deficiency presented in this exhibit:

- The Departmental Directive OM 3-104, *Clearance of Personnel for Separation or Transfer*
- National Institute of Standards and Technology Special Publication 800-53 Revision 4, dated April 2013, *AC-2 Account Management, AC-5 Separation of Duties, AC-6 Least Privilege, CM-3 Configuration Change Control*

- Federal Information Processing Standards 200, *Minimum Security Requirements for Federal Information and Information systems*
- The *Standards for Internal Control in the Federal Government*, issued by the Comptroller General of the United States, Principle No. 7, *Identify, Analyze, and Respond to Risks*, Principle No. 11, *Design Activities for the Information System*, and Principle No. 13, *Use Quality Information*
- Appendix III to OMB Circular No. A-130, Section 4, Specific Requirements, *I. Specific Safeguarding Measures to Reinforce the Protection of Federal Information and Information Systems*

Recommendations:

We recommend that the Department and FSA management:

1. Perform comprehensive user access reviews and re-certifications, and confirm the access lists received for review by designated management are complete and accurate prior to commencing the review.
2. Implement mechanisms and procedures to require timely notification of user separations and subsequent disabling of access.
3. Establish requirements for formal documentation of data validation following data migration for systems.
4. Prevent or limit developer access in the production environment to read-only.

Exhibit C

Compliance Matter**Requirement for Referring Delinquent Student Loan Debts to Treasury**

In 2014, Federal Law (31 U.S. Code Section 3716(c) (6)) was amended (Public Law 113-101 (*DATA Act*) Section 5) to require agencies to notify the Secretary of the Treasury of valid, delinquent nontax debts that are over 120 days delinquent – 60 days earlier than the previous 180 days requirement – for the purpose of administrative offset (i.e., collection through the reduction of future Federal payments). Due to the number of entities and systems involved in handling student loan debts and the decentralized nature of such processes, FSA is not yet capable of meeting this accelerated timeline. Accordingly, as of September 30, 2018, the Department and FSA are not in compliance with the requirement to refer student debt delinquent for 120 days to the Department of the Treasury.

To meet this requirement, the Department obtained legal clarification of how certain specific requirements of the amended law apply to the Direct Loan Program and other Department programs, and are improving delinquent debt reporting procedures, increasing the frequency of some debt referrals, and modifying its defaulted loan management system to accommodate this change. The Department is also evaluating the impact of defining defaulted loans earlier in schools' performance reporting and has developed a long-term project plan to incorporate the new referral requirements into various servicer contracts and guaranty agency agreements, so it can initiate the required system programming changes. FSA is also working with the Department in evaluating certain options for other requirements needed to achieve compliance.

Recommendation:

We recommend that the Department continue to execute the corrective actions as outlined in FSA's project plan to comply with the timing requirement for the referral of delinquent non-tax debts.

Management's Response

Exhibit D





UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE CHIEF FINANCIAL OFFICER

MEMORANDUM

NOV 14 2018

TO: Kathleen S. Tighe
Inspector General

FROM: Larry Kean 
Director, Budget Service Delegated
the Duties of Chief Financial Officer

Jason Gray 
Chief Information Officer

SUBJECT: DRAFT INDEPENDENT AUDITORS' REPORT
Fiscal Year 2018 Financial Statements
U.S. Department of Education
ED-OIG/A17S0001

Please convey the Department's sincere thanks to everyone on your staff who worked diligently on this financial statement audit. The Department reviewed the draft Fiscal Year 2018 Financial Statement Audit Report. We concur and agree with the Independent Auditors' Report, including the Opinion on the Financial Statements, Report on Internal Control over Financial Reporting, and Report on Compliance and Other Matters.

We will share the final audit results with responsible senior officials, other interested program managers, and staff. At that time, we will also request the preparation of corrective action plans to be used in the resolution process.

Again, please convey our appreciation to everyone on your staff whose efforts permitted the Department to complete the audit within the established timeframe.

Please contact Gary Wood, Director, Financial Management Operations and Acting Deputy Chief Financial Officer, at (202) 245-8118 with any questions or comments.

550 12th St. S.W., WASHINGTON, DC 20202
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