

# PRELIMINARY OFFICIAL STATEMENT DATED JANUARY 13, 2022

In the opinion of Kennedy & Graven, Chartered, Bond Counsel, based on present federal and Minnesota laws, regulations, rulings and decisions (which exclude any pending legislation which may have a retroactive effect), and assuming compliance with certain covenants, interest to be paid on the Bonds is excluded from gross income for federal income tax purposes and, to the same extent, from taxable net income of individuals, estates and trusts for Minnesota income tax purposes, and is not a preference item for purposes of computing the federal alternative minimum tax or the Minnesota alternative minimum tax imposed on individuals, trusts, and estates. Such interest is subject to Minnesota franchise taxes on corporations (including financial institutions) measured by income. No opinion will be expressed by Bond Counsel regarding other state or federal tax consequences caused by the receipt or accrual of interest on the Bonds or arising with respect to ownership of the Bonds. See "Tax Exemption" herein.

The District will NOT designate the Bonds as "qualified tax-exempt obligations" pursuant to Section 265 of the Internal Revenue Code of 1986, as amended, which permits financial institutions to deduct interest expenses allocable to the Bonds to the extent permitted under prior law.

## New Issue

## Rating Application Made: Moody's Investors Service, Inc.

# INDEPENDENT SCHOOL DISTRICT NO. 2889 (LAKE PARK AUDUBON), MINNESOTA (Becker, Clay and Otter Tail Counties)

(Minnesota School District Credit Enhancement Program)

## \$22,960,000\* GENERAL OBLIGATION SCHOOL BUILDING BONDS, SERIES 2022A

**PROPOSAL OPENING:** January 24, 2022, 10:30 A.M., C.T. **CONSIDERATION:** January 24, 2022, 6:30 P.M., C.T.

**PURPOSE/AUTHORITY/SECURITY:** The \$22,960,000\* General Obligation School Building Bonds, Series 2022A (the "Bonds") are being issued pursuant to Minnesota Statutes, Chapter 475, and a special election held November 2, 2021 by Independent School District No. 2889 (Lake Park Audubon), Minnesota (the "District") for the purpose of financing the acquisition and betterment of school sites and facilities in the District. The Bonds will be general obligations of the District for which its full faith and credit and taxing powers are pledged. Delivery is subject to receipt of an approving legal opinion of Kennedy & Graven, Chartered, Minneapolis, Minnesota.

**DATE OF BONDS:** February 17, 2022

**MATURITY:** February 1 as follows:

<u>Year</u>	<u>Amount*</u>	<u>Year</u>	<u>Amount*</u>	<u>Year</u>	<u>Amount*</u>
2027	\$40,000	2033	\$1,490,000	2039	\$1,785,000
2028	340,000	2034	1,540,000	2040	1,840,000
2029	1,245,000	2035	1,585,000	2041	1,890,000
2030	1,345,000	2036	1,635,000	2042	1,950,000
2031	1,410,000	2037	1,680,000		
2032	1,450,000	2038	1,735,000		

**MATURITY  
ADJUSTMENTS:**

\* The District reserves the right to increase or decrease the principal amount of the Bonds on the day of sale, in increments of \$5,000 each. Increases or decreases may be made in any maturity. If any principal amounts are adjusted, the purchase price proposed will be adjusted to maintain the same gross spread per \$1,000.

**TERM BONDS:**

See "Term Bond Option" herein.

**INTEREST:**

August 1, 2022 and semiannually thereafter.

**OPTIONAL**

Bonds maturing on February 1, 2031 and thereafter are subject to call for prior optional redemption on February 1, 2030 and any date thereafter, at a price of par plus accrued interest.

**REDEMPTION:**

\$22,960,000.

**MINIMUM PROPOSAL:**

\$22,960,000.

**MAXIMUM PROPOSAL:**

\$24,337,600.

**GOOD FAITH DEPOSIT:**

A good faith deposit in the amount of \$459,200 shall be made by the winning bidder by wire transfer of funds.

**PAYING AGENT:**

Bond Trust Services Corporation

**BOND COUNSEL:**

Kennedy & Graven, Chartered

**MUNICIPAL ADVISOR:**

Ehlers and Associates, Inc.

**BOOK-ENTRY-ONLY:**

See "Book-Entry-Only System" herein (unless otherwise specified by the purchaser).

This Preliminary Official Statement and the information contained herein are subject to completion and amendment. These securities may not be sold or may offers to buy be accepted prior to the time the Official Statement is delivered in final form. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy these securities in any jurisdiction in which such offer, solicitation or sale would be unlawful prior to registration or qualification under the securities laws of any such jurisdiction. This Preliminary Official Statement is in a form deemed final as of its date for purposes of SEC Rule 15c2-12(b) (1), but is subject to revision, amendment and completion in a final Official Statement.

## **REPRESENTATIONS**

No dealer, broker, salesperson or other person has been authorized by the District to give any information or to make any representation other than those contained in this Preliminary Official Statement and, if given or made, such other information or representations must not be relied upon as having been authorized by the District. ***This Preliminary Official Statement does not constitute an offer to sell or a solicitation of an offer to buy any of the Bonds in any jurisdiction to any person to whom it is unlawful to make such an offer or solicitation in such jurisdiction.***

This Preliminary Official Statement is not to be construed as a contract with the Syndicate Manager or Syndicate Members. Statements contained herein which involve estimates or matters of opinion are intended solely as such and are not to be construed as representations of fact. Ehlers and Associates, Inc. prepared this Preliminary Official Statement and any addenda thereto relying on information of the District and other sources for which there is reasonable basis for believing the information is accurate and complete.

Bond Counsel has not participated in the preparation of this Preliminary Official Statement and is not expressing any opinion as to the completeness or accuracy of the information contained therein. Compensation of Ehlers and Associates, Inc., payable entirely by the District, is contingent upon the delivery of the Bonds.

## **COMPLIANCE WITH S.E.C. RULE 15c2-12**

Certain municipal obligations (issued in an aggregate amount over \$1,000,000) are subject to Rule 15c2-12 promulgated by the Securities and Exchange Commission pursuant to the Securities Exchange Act of 1934, as amended (the "Rule").

**Preliminary Official Statement:** This Preliminary Official Statement was prepared for the District for dissemination to potential investors. Its primary purpose is to disclose information regarding the Bonds to prospective underwriters in the interest of receiving competitive proposals in accordance with the sale notice contained herein. Unless an addendum is posted prior to the sale, this Preliminary Official Statement shall be deemed nearly final for purposes of the Rule subject to completion, revision and amendment in a Final Official Statement as defined below.

**Review Period:** This Preliminary Official Statement has been distributed to prospective bidders for review. Comments or requests for the correction of omissions or inaccuracies must be submitted to Ehlers and Associates, Inc. at least two business days prior to the sale. Requests for additional information or corrections in the Preliminary Official Statement received on or before this date will not be considered a qualification of a proposal received from an underwriter. If there are any changes, corrections or additions to the Preliminary Official Statement, interested bidders will be informed by an addendum prior to the sale.

**Final Official Statement:** Copies of the Final Official Statement will be delivered to the underwriter (Syndicate Manager) within seven business days following the proposal acceptance.

**Continuing Disclosure:** Subject to certain exemptions, issues in an aggregate amount over \$1,000,000 may be required to comply with provisions of the Rule which require that underwriters obtain from the issuers of municipal securities (or other obligated party) an agreement for the benefit of the owners of the securities to provide continuing disclosure with respect to those securities. This Preliminary Official Statement describes the conditions under which the District is required to comply with the Rule.

## **CLOSING CERTIFICATES**

Upon delivery of the Bonds, the underwriter (Syndicate Manager) will be furnished with the following items: (1) a certificate of the appropriate officials to the effect that at the time of the sale of the Bonds and all times subsequent thereto up to and including the time of the delivery of the Bonds, this Preliminary Official Statement did not and does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements therein, in the light of the circumstances under which they were made, not misleading; (2) a receipt signed by the appropriate officer evidencing payment for the Bonds; (3) a certificate evidencing the due execution of the Bonds, including statements that (a) no litigation of any nature is pending, or to the knowledge of signers, threatened, restraining or enjoining the issuance and delivery of the Bonds, (b) neither the corporate existence or boundaries of the District nor the title of the signers to their respective offices is being contested, and (c) no authority or proceedings for the issuance of the Bonds have been repealed, revoked or rescinded; and (4) a certificate setting forth facts and expectations of the District which indicates that the District does not expect to use the proceeds of the Bonds in a manner that would cause them to be arbitrage bonds within the meaning of Section 148 of the Internal Revenue Code of 1986, as amended, or within the meaning of applicable Treasury Regulations.

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## **LAKE PARK AUDUBON SCHOOL BOARD**

		<u>Term Expires</u>
Becky Mitchell	Chair	January 2023
David O'Connell	Vice Chair	January 2023
Marge Beaudine	Clerk	January 2025
Vacant	Treasurer**	January 2025
Mark Johnson	Member	January 2025
Marvin Vareberg	Member	January 2023
Austin Veralrud	Member	January 2023

\*\* The Treasurer will be appointed at the District's first meeting in January 2022.

## **ADMINISTRATION**

Dr. Tim Godfrey, Superintendent of Schools

Amanda Scanson, Business Director

Shanna Rix-Bach, Finance Assistant

## **PROFESSIONAL SERVICES**

Kennedy & Graven, Chartered, Bond Counsel, Minneapolis, Minnesota

Ehlers and Associates, Inc., Municipal Advisors, Roseville, Minnesota  
*(Other offices located in Waukesha, Wisconsin and Denver, Colorado)*

## INTRODUCTORY STATEMENT

This Preliminary Official Statement contains certain information regarding Independent School District No. 2889 (Lake Park Audubon), Minnesota (the "District") and the issuance of its \$22,960,000\* General Obligation School Building Bonds, Series 2022A (the "Bonds"). Any descriptions or summaries of the Bonds, statutes, or documents included herein are not intended to be complete and are qualified in their entirety by reference to such statutes and documents and the form of the Bonds to be included in the resolution authorizing the issuance and sale of the Bonds ("Award Resolution") to be adopted by the School Board on January 24, 2022.

Inquiries may be directed to Ehlers and Associates, Inc. ("Ehlers" or the "Municipal Advisor"), Roseville, Minnesota, (651) 697-8500, the District's municipal advisor. A copy of this Preliminary Official Statement may be downloaded from Ehlers' web site at [www.ehlers-inc.com](http://www.ehlers-inc.com) by connecting to the Bond Sales link and following the directions at the top of the site.

## THE BONDS

### GENERAL

The Bonds will be issued in fully registered form as to both principal and interest in denominations of \$5,000 each or any integral multiple thereof, and will be dated, as originally issued, as of February 17, 2022. The Bonds will mature on February 1 in the years and amounts set forth on the cover of this Preliminary Official Statement. Interest will be payable on February 1 and August 1 of each year, commencing August 1, 2022, to the registered owners of the Bonds appearing of record in the bond register as of the close of business on the 15th day (whether or not a business day) of the immediately preceding month. Interest will be computed upon the basis of a 360-day year of twelve 30-day months and will be rounded pursuant to rules of the Municipal Securities Rulemaking Board ("MSRB"). **The rate for any maturity may not be more than 2.00% less than the rate for any preceding maturity. (For example, if a rate of 4.50% is proposed for the 2027 maturity, then the lowest rate that may be proposed for any later maturity is 2.50%.)** All Bonds of the same maturity must bear interest from the date of issue until paid at a single, uniform rate. Each rate must be expressed in an integral multiple of 5/100 or 1/8 of 1%.

Unless otherwise specified by the purchaser, the Bonds will be registered in the name of Cede & Co., as nominee for The Depository Trust Company, New York, New York ("DTC"). (See "Book-Entry-Only System" herein.) As long as the Bonds are held under the book-entry system, beneficial ownership interests in the Bonds may be acquired in book-entry form only, and all payments of principal of, premium, if any, and interest on the Bonds shall be made through the facilities of DTC and its participants. If the book-entry system is terminated, principal of, premium, if any, and interest on the Bonds shall be payable as provided in the Award Resolution.

The District has selected Bond Trust Services Corporation, Roseville, Minnesota, to act as paying agent (the "Paying Agent"). Bond Trust Services Corporation and Ehlers are affiliate companies. The District will pay the charges for Paying Agent services. The District reserves the right to remove the Paying Agent and to appoint a successor.

\*Preliminary, subject to change.

## **OPTIONAL REDEMPTION**

At the option of the District, the Bonds maturing on or after February 1, 2031 shall be subject to optional redemption prior to maturity on February 1, 2030 or any date thereafter, at a price of par plus accrued interest to the date of optional redemption.

Redemption may be in whole or in part of the Bonds subject to prepayment. If redemption is in part, the selection of the amounts and maturities of the Bonds to be redeemed shall be at the discretion of the District. If only part of the Bonds having a common maturity date are called for redemption, then the District or Paying Agent, if any, will notify DTC of the particular amount of such maturity to be redeemed. DTC will determine by lot the amount of each participant's interest in such maturity to be redeemed and each participant will then select by lot the beneficial ownership interest in such maturity to be redeemed.

Notice of redemption shall be sent by mail not more than 60 days and not less than 30 days prior to the date fixed for redemption to the registered owner of each Bond to be redeemed at the address shown on the registration books.

## **AUTHORITY;PURPOSE**

The Bonds are being issued by the District pursuant to Minnesota Statutes, Chapter 475, and a special election held November 2, 2021, at which voters approved the issuance of \$22,960,000 in school building bonds.

Question No. 1 was approved by a vote of 546 to 316, and authorized the issuance of \$21,630,000 to acquisition and betterment of school sites and facilities, including the construction and equipping of classroom additions at the Audubon Elementary School, the renovation and remodeling of special education spaces, the construction and equipping of flexible learning spaces and small group spaces, remodeling and updating of the office suite, cafeteria, bathrooms, locker rooms, kitchen, gymnasium, and playground at that school, roof repair and replacement, the acquisition, construction and installation of HVAC improvements, safety and security upgrades, and the construction of site, side walk, parking lot, and traffic flow improvements at the elementary school site.

Question No. 2 was approved by a vote of 519 to 341, and authorized the issuance of \$1,330,000 for the acquisition and betterment of school sites and facilities, including the construction and equipping of a career and technical education addition at the Lake Park Secondary School, the creation of collaboration learning areas, and renovation and remodeling of the media center at that school.

## **ESTIMATED SOURCES AND USES\***

### **Sources**

Par Amount of Bonds	\$22,960,000
Reoffering Premium	<u>1,744,480</u>
<b>Total Sources</b>	<b>\$24,704,480</b>

### **Uses**

Total Underwriter's Discount (1.000%)	\$229,600
Costs of Issuance	110,000
Deposit to Project Construction Fund	<u>24,364,880</u>
<b>Total Uses</b>	<b>\$24,704,480</b>

\*Preliminary, subject to change.

## **SECURITY**

The Bonds are general obligations of the District to which its full faith and credit and taxing powers are pledged. In accordance with Minnesota Statutes, the District will levy each year an amount not less than 105% of the debt service requirements on the Bonds, less estimated collections of other revenues pledged for payments on the Bonds. In the event funds on hand for payment of principal and interest are at any time insufficient, the District is required to levy additional taxes upon all taxable properties within its boundaries without limit as to rate or amount to make up any deficiency.

## **RATING**

The District will be participating in the State of Minnesota Credit Enhancement Program ("MNCEP") for this issue and is requesting a rating from Moody's Investors Service, Inc. ("Moody's"). Moody's has a policy which assigns a minimum rating of "Aa2" to issuers participating in the MNCEP. The "Aa2" rating is based on the State of Minnesota's current "Aa1" rating from Moody's. See "STATE OF MINNESOTA CREDIT ENHANCEMENT PROGRAM FOR SCHOOL DISTRICTS" for further details.

The District does not currently have an underlying rating, however, has requested an underlying rating on this issue from Moody's. Such rating reflects only the views of such organization and explanations of the significance of such rating may be obtained from the rating agency furnishing the same. Generally, a rating agency bases its rating on the information and materials furnished to it and on investigations, studies and assumptions of its own. There is no assurance that such rating will continue for any given period of time or that it will not be revised downward or withdrawn entirely by such rating agency, if in the judgment of such rating agency circumstances so warrant. Any such downward revision or withdrawal of such rating may have an adverse effect on the market price of the Bonds.

Such rating is not to be construed as a recommendation of the rating agency to buy, sell or hold the Bonds, and the rating assigned by the rating agency should be evaluated independently. Except as may be required by the Disclosure Undertaking described under the heading "CONTINUING DISCLOSURE" neither the District nor the underwriter undertake responsibility to bring to the attention of the owner of the Bonds any proposed changes in or withdrawal of such rating or to oppose any such revision or withdrawal.

## **STATE OF MINNESOTA CREDIT ENHANCEMENT PROGRAM FOR SCHOOL DISTRICTS**

By resolution adopted for this issue on November 22, 2021 (the "Resolution"), the District has covenanted and obligated itself to be bound by the provisions of Minnesota Statutes, Section 126C.55, which provides for payment by the State of Minnesota in the event of a potential default of a school district obligation (herein referred to as the "State Payment Law" or the "Law"). The provisions of the State Payment Law shall be binding on the District as long as any obligations of the issue remain outstanding.

Under the State Payment Law, if the District believes it may be unable to make a principal or interest payment for this issue on the due date, it must notify the Commissioner of Education as soon as possible, but not less than 15 working days prior to the due date (which notice is to specify certain information) that it intends to exercise the provisions of the Law to guarantee payment of the principal and interest when due. The District also covenants in the Resolution to deposit with the Paying Agent for the issue three business days prior to the date on which a payment is due an amount sufficient to make that payment or to notify the Commissioner of Education that it will be unable to make all or a portion of the payment.

The Law also requires the Paying Agent for this issue to notify the Commissioner of Education if it becomes aware of a potential default in the payment of principal and interest on these obligations, or if, on the day two business days prior to the payment date, there are insufficient funds to make the payment or deposit with the Paying Agent.

The Law also requires, after receipt of a notice which requests a payment pursuant to the Law, after consultation with the Paying Agent and District, and after verifying the accuracy of the information provided, the Commissioner of Education shall notify the Commissioner of Management and Budget of the potential default. The State Payment Law provides that upon receipt of this notice . . . the commissioner of management and budget shall issue a payment and authorize the commissioner of education to pay to the paying agent for the debt obligation the specified amount on or before the date due. The amounts needed for the purposes of this subdivision are annually appropriated to the [Department of Education] from the state general fund.

The Law requires that all amounts paid by the State on behalf of any School District are required to be repaid by the District to the State with interest, either via a reduction in State aid payable to the District, or through the levy of an ad valorem tax which may be made with the approval of the Commissioner of Education.

In its Official Statement dated September 9, 2021, for General Obligation State Bonds, Series 2021A and 2021B, the State of Minnesota disclosed the following information about the State Credit Enhancement Program for School Districts.

As of June 30, 2021, the date of this Official Statement, the total amount of principal on certificates of indebtedness and capital notes issued for equipment, certificates of participation and bonds, plus the interest on these obligations, through the year 2050, is approximately \$16,995,000,000. Based upon these currently outstanding balances now enrolled in the program, during the Current Biennium the total amount of principal and interest outstanding as of June 30, 2021 is currently estimated at \$2,500,000,000, with the maximum amount of principal and interest payable in any one month being \$975,700,000. However, more certificates of indebtedness, capital notes, certificates of participation and bonds are expected to be enrolled in the program and these amounts are expected to increase.

The State has not had to make any debt service payments on behalf of school districts or intermediate school districts under the program and does not expect to make any payments in the future. If such payments are made the State expects to recover all or substantially all of the amounts so paid pursuant to contractual agreements with the school districts and intermediate school districts.

## **CONTINUING DISCLOSURE**

In order to assist brokers, dealers, and municipal securities dealers, in connection with their participation in the offering of the Bonds, to comply with Rule 15c2-12 promulgated by the Securities and Exchange Commission, pursuant to the Securities and Exchange Act of 1934, as amended (the "Rule"), the District shall agree to provide certain information to the Municipal Securities Rulemaking Board (MSRB) through its Electronic Municipal Market Access (EMMA) system, or any system that may be prescribed in the future. The Rule was last amended, effective February 27, 2019, to include an expanded list of material events.

On the date of issue and delivery of the Bonds, the District shall execute and deliver a Continuing Disclosure Certificate, under which the District will covenant for the benefit of holders including beneficial holders, to provide electronically, or in a manner otherwise prescribed, certain financial information annually and to provide notices of the occurrence of certain events enumerated in the Rule (the "Disclosure Undertaking"). The details and terms of the Disclosure Undertaking for the District are set forth in Appendix D. Such Disclosure Undertaking will be in substantially the form attached hereto.

A failure by the District to comply with any Disclosure Undertaking will not constitute an event of default on the Bonds. However, such a failure may adversely affect the transferability and liquidity of the Bonds and their market price.

In the previous five years, the District believes it has not failed to comply in all material respects with its prior undertakings under the Rule. The District has reviewed its continuing disclosure responsibilities along with any changes to the Rule, to ensure compliance. Ehlers is currently engaged as dissemination agent for the District.

## **LEGAL OPINION**

An opinion as to the validity of the Bonds and the exemption from taxation of the interest thereon will be furnished by Kennedy & Graven, Chartered, Minneapolis, Minnesota, Bond Counsel to the District, and will be available at the time of delivery of the Bonds. The legal opinion will state that the Bonds are valid and binding general obligations of the District; provided that the rights of the owners of the Bonds and the enforceability of the Bonds may be limited by bankruptcy, insolvency, reorganization, moratorium, and other similar laws affecting creditors' rights and by equitable principles (which may be applied in either a legal or equitable proceeding). See "FORM OF LEGAL OPINION" found in Appendix B.

## **TAX EXEMPTION**

In the opinion of Bond Counsel, under existing statutes, regulations, rulings and decisions, interest on the Bonds is excludable from gross income of the owners thereof for purposes of federal income taxation and is excludable from taxable net income of individuals, estates and trusts for purposes of State of Minnesota income taxation, but is subject to State of Minnesota franchise taxes measured by income that are imposed upon corporations, including financial institutions.

Noncompliance following the issuance of the Bonds with certain requirements of the Internal Revenue Code of 1986, as amended (the "Code") and covenants of the Award Resolution may result in the inclusion of interest on the Bonds in gross income (for federal tax purposes) and taxable net income (for State of Minnesota tax purposes) of the owners thereof. No provision has been made for redemption of the Bonds, or for an increase in the interest rate on the Bonds, in the event that interest on the Bonds becomes subject to United States or State of Minnesota income taxation.

The Code imposes an alternative minimum tax with respect to individuals on alternative minimum taxable income.

The Code provides that in the case of an insurance company subject to the tax imposed by Section 831 of the Code, the amount which otherwise would be taken into account as "losses incurred" under Section 832(b)(5) shall be reduced by an amount equal to the applicable percentage of the interest on the Bonds that is received or accrued during the taxable year. For purposes hereof, the applicable percentage is 5.25% divided by the highest rate in effect under Section 11(b) of the Code.

Interest on the Bonds may be included in the income of a foreign corporation for purposes of the branch profits tax imposed by Section 884 of the Code. Under certain circumstances, interest on the Bonds may be subject to the tax on "excess net passive income" of Subchapter S corporations imposed by Section 1375 of the Code.

The above is not a comprehensive list of all federal tax consequences which may arise from the receipt of interest on the Bonds. The receipt of interest on the Bonds may otherwise affect the federal or State income tax liability of the recipient based on the particular taxes to which the recipient is subject and the particular tax status of other items or deductions. Bond Counsel expresses no opinion regarding any such consequences. All prospective purchasers of the Bonds are advised to consult their own tax advisors as to the tax consequences of, or tax considerations for, purchasing or holding the Bonds.

## **Legislative proposals**

Bond Counsel's opinion is given as of its date and Bond Counsel assumes no obligation to update, revise, or supplement such opinion to reflect any changes in facts or circumstances or any changes in law that may hereafter occur. Proposals are regularly introduced in both the United States House of Representatives and the United States Senate that, if enacted, could alter or affect the tax-exempt status on municipal bonds. For example, legislation has been proposed that would, among other things, limit the amount of exclusions (including tax-exempt interest) or deductions that certain higher-income taxpayers could use to reduce their tax liability. The likelihood of adoption of this or any other such legislative proposal relating to tax-exempt bonds cannot be reliably predicted. If enacted into law, current or future proposals may have a prospective or retroactive effect and could affect the value or marketability of tax-exempt bonds (including the Bonds). Prospective purchasers of the Bonds should consult their own tax advisors regarding the impact of any such change in law.

## **NON-QUALIFIED TAX-EXEMPT OBLIGATIONS**

The District will NOT designate the Bonds as "qualified tax-exempt obligations" pursuant to Section 265(b)(3) of the Code, which permits financial institutions to deduct from income for federal income tax purposes, interest expense that is allocable to carrying and acquiring tax-exempt obligations.

## **MUNICIPAL ADVISOR**

Ehlers has served as municipal advisor to the District in connection with the issuance of the Bonds. The Municipal Advisor cannot participate in the underwriting of the Bonds. The financial information included in this Preliminary Official Statement has been compiled by the Municipal Advisor. Such information does not purport to be a review, audit or certified forecast of future events and may not conform with accounting principles applicable to compilations of financial information. Ehlers is not a firm of certified public accountants. Ehlers is registered with the Securities and Exchange Commission and the MSRB as a municipal advisor. Ehlers makes no representation, warranty or guarantee regarding the accuracy or completeness of the information in this Preliminary Official Statement, and its assistance in preparing this Preliminary Official Statement should not be construed as a representation that it has independently verified such information.

## **MUNICIPAL ADVISOR AFFILIATED COMPANIES**

Bond Trust Services Corporation ("BTSC") and Ehlers Investment Partners, LLC ("EIP") are affiliate companies of Ehlers. BTSC is chartered by the State of Minnesota and authorized in Minnesota, Wisconsin, Colorado, and Illinois to transact the business of a limited purpose trust company. BTSC provides paying agent services to debt issuers. EIP is a Registered Investment Advisor with the Securities and Exchange Commission. EIP assists issuers with the investment of bond proceeds or investing other issuer funds. This includes escrow bidding agent services. Issuers, such as the District, have retained or may retain BTSC and/or EIP to provide these services. If hired, BTSC and/or EIP would be retained by the District under an agreement separate from Ehlers.

## **INDEPENDENT AUDITORS**

The basic financial statements of the District for the fiscal year ended June 30, 2021 have been audited by EideBailly LLP, Fargo, North Dakota, independent auditors (the "Auditor"). The report of the Auditor, together with the basic financial statements, component units financial statements, and notes to the financial statements are attached hereto as "APPENDIX A – FINANCIAL STATEMENTS". The Auditor has not been engaged to perform and has not performed, since the date of its report included herein, any procedures on the financial statements addressed in that report. The Auditor also has not performed any procedures relating to this Preliminary Official Statement.

## **RISK FACTORS**

Following is a description of possible risks to holders of the Bonds without weighting as to probability. This description of risks is not intended to be all-inclusive, and there may be other risks not now perceived or listed here.

**Taxes:** The Bonds are general obligations of the District, the ultimate payment of which rests in the District's ability to levy and collect sufficient taxes to pay debt service should other revenue (state aids) be insufficient. In the event of delayed billing, collection or distribution of property taxes, sufficient funds may not be available to the District in time to pay debt service when due.

**State Actions:** Many elements of local government finance, including the issuance of debt and the levy of property taxes, are controlled by state government. Future actions of the state may affect the overall financial condition of the District, the taxable value of property within the District, and the ability of the District to levy and collect property taxes.

**Future Changes in Law:** Various State and federal laws, regulations and constitutional provisions apply to the District and to the Bonds. The District can give no assurance that there will not be a change in or interpretation of any such applicable laws, regulations and provisions which would have a material effect on the District or the taxing authority of the District.

**Ratings; Interest Rates:** In the future, the District's credit rating may be reduced or withdrawn, or interest rates for this type of obligation may rise generally, either possibility resulting in a reduction in the value of the Bonds for resale prior to maturity.

**Tax Exemption:** If the federal government or the State of Minnesota taxes all or a portion of the interest on municipal obligations, directly or indirectly, or if there is a change in federal or state tax policy, the value of the Bonds may fall for purposes of resale. Noncompliance following the issuance of the Bonds with certain requirements of the Code and covenants of the Award Resolution may result in the inclusion of interest on the Bonds in gross income of the recipient for United States income tax purposes or in taxable net income of individuals, estates or trusts for State of Minnesota income tax purposes. No provision has been made for redemption of the Bonds, or for an increase in the interest rate on the Bonds, in the event that interest on the Bonds becomes subject to federal or State of Minnesota income taxation, retroactive to the date of issuance.

**Continuing Disclosure:** A failure by the District to comply with the Disclosure Undertaking for continuing disclosure (see "CONTINUING DISCLOSURE") will not constitute an event of default on the Bonds. Any such failure must be reported in accordance with the Rule and must be considered by any broker, dealer, or municipal securities dealer before recommending the purchase or sale of the Bonds in the secondary market. Such a failure may adversely affect the transferability and liquidity of the Bonds and their market price.

**State Economy; State Aids:** State of Minnesota cash flow problems could affect local governments and possibly increase property taxes.

**Book-Entry-Only System:** The timely credit of payments for principal and interest on the Bonds to the accounts of the Beneficial Owners of the Bonds may be delayed due to the customary practices, standing instructions or for other unknown reasons by DTC participants or indirect participants. Since the notice of redemption or other notices to holders of these obligations will be delivered by the District to DTC only, there may be a delay or failure by DTC, DTC participants or indirect participants to notify the Beneficial Owners of the Bonds.

**Economy:** A combination of economic, climatic, political or civil disruptions or terrorist actions outside of the control of the District, including loss of major taxpayers or major employers, could affect the local economy and result in reduced tax collections and/or increased demands upon local government. Real or perceived threats to the financial stability of the District may have an adverse effect on the value of the Bonds in the secondary market.

**Secondary Market for the Bonds:** No assurance can be given that a secondary market will develop for the purchase and sale of the Bonds or, if a secondary market exists, that such Bonds can be sold for any particular price. The underwriters are not obligated to engage in secondary market trading or to repurchase any of the Bonds at the request of the owners thereof. Prices of the Bonds as traded in the secondary market are subject to adjustment upward and downward in response to changes in the credit markets and other prevailing circumstances. No guarantee exists as to the future market value of the Bonds. Such market value could be substantially different from the original purchase price.

**Bankruptcy:** The rights and remedies of the holders may be limited by and are subject to the provisions of federal bankruptcy laws, to other laws, or equitable principles that may affect the enforcement of creditors' rights, to the exercise of judicial discretion in appropriate cases and to limitations on legal remedies against local governments. The opinion of Bond Counsel to be delivered with respect to the Bonds will be similarly qualified.

**Cybersecurity:** The District is dependent on electronic information technology systems to deliver services. These systems may contain sensitive information or support critical operational functions which may have value for unauthorized purposes. As a result, the electronic systems and networks may be targets of cyberattack. There can be no assurance that the District will not experience an information technology breach or attack with financial consequences that could have a material adverse impact.

**Impact of the Spread of COVID-19:** In late 2019, a novel strain of coronavirus (COVID-19) emerged in Wuhan, Hubei Province, China. COVID-19 has spread throughout the world, including to the United States, resulting in the World Health Organization proclaiming COVID-19 to be a pandemic and the declaration of a national emergency. In response to the spread of COVID-19, the United States government, state governments, local governments and private industries have taken measures to limit social interactions in an effort to limit the spread of COVID-19. The effects of the spread of COVID-19 and the government and private responses to the spread continue to rapidly evolve. COVID-19 has caused significant disruptions to the global, national and State economy. The extent to which the coronavirus impacts the District and its financial condition will depend on future developments, which are highly uncertain and cannot be predicted by the District, including the duration of the outbreak and measures taken to address the outbreak.

On March 13, 2020, Minnesota Governor Tim Walz signed Emergency Executive Order 20-01 and declared a peacetime emergency. In subsequent executive orders, the Governor extended the peacetime emergency by 30 days. On May 14, 2021, the Governor signed Executive Order 21-23 to end the statewide mask requirement and align with new Centers for Disease Control and Prevention (CDC) guidance on face coverings. The Minnesota Legislature ended the peacetime emergency declaration on July 1, 2021.

The Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act") provides for federal payments from the Coronavirus Relief Fund to the State for the discrete purpose of covering expenses directly incurred as a result of COVID-19 between March 1 and December 30, 2020. On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021, which provides local governments an additional \$130.2 billion through the Coronavirus Local Fiscal Recovery Fund. These funds can be used to mitigate increased expenditures, lost revenue and economic hardship related to the COVID-19 pandemic.

The foregoing is intended only as a summary of certain risk factors attendant to an investment in the Bonds. In order for potential investors to identify risk factors and make an informed investment decision, potential investors should be thoroughly familiar with this entire Preliminary Official Statement and the Appendices hereto.

# VALUATIONS

## OVERVIEW

All non-exempt property is subject to taxation by local taxing districts. Exempt real property includes Indian lands, public property, and educational, religious and charitable institutions. Most personal property is exempt from taxation (except investor-owned utility mains, generating plants, etc.).

The valuation of property in Minnesota consists of three elements. (1) The estimated market value is set by city or county assessors. Not less than 20% of all real properties are to be appraised by local assessors each year. (2) The taxable market value is the estimated market value adjusted by all legislative exclusions. (3) The tax capacity (taxable) value of property is determined by class rates set by the State Legislature. The tax capacity rate varies according to the classification of the property. Tax capacity represents a percent of taxable market value.

The property tax rate for a local taxing jurisdiction is determined by dividing the total tax capacity or market value of property within the jurisdiction into the dollars to be raised from the levy. State law determines whether a levy is spread on tax capacity or market value. Major classifications and the percentages by which tax capacity is determined are:

Type of Property	2018/19	2019/20	2020/21
Residential homestead <sup>1</sup>	First \$500,000 - 1.00% Over \$500,000 - 1.25%	First \$500,000 - 1.00% Over \$500,000 - 1.25%	First \$500,000 - 1.00% Over \$500,000 - 1.25%
Agricultural homestead <sup>1</sup>	First \$500,000 HGA - 1.00% Over \$500,000 HGA - 1.25% First \$1,940,000 - 0.50% <sup>2</sup> Over \$1,940,000 - 1.00% <sup>2</sup>	First \$500,000 HGA - 1.00% Over \$500,000 HGA - 1.25% First \$1,880,000 - 0.50% <sup>2</sup> Over \$1,880,000 - 1.00% <sup>2</sup>	First \$500,000 HGA - 1.00% Over \$500,000 HGA - 1.25% First \$1,900,000 - 0.50% <sup>2</sup> Over \$1,900,000 - 1.00% <sup>2</sup>
Agricultural non-homestead	Land - 1.00% <sup>2</sup>	Land - 1.00% <sup>2</sup>	Land - 1.00% <sup>2</sup>
Seasonal recreational residential	First \$500,000 - 1.00% <sup>3</sup> Over \$500,000 - 1.25% <sup>3</sup>	First \$500,000 - 1.00% <sup>3</sup> Over \$500,000 - 1.25% <sup>3</sup>	First \$500,000 - 1.00% <sup>3</sup> Over \$500,000 - 1.25% <sup>3</sup>
Residential non-homestead:	1 unit - 1st \$500,000 - 1.00% Over \$500,000 - 1.25% 2-3 units - 1.25% 4 or more - 1.25% Small City <sup>4</sup> - 1.25% Affordable Rental: First \$139,000 - .75% Over \$139,000 - .25%	1 unit - 1st \$500,000 - 1.00% Over \$500,000 - 1.25% 2-3 units - 1.25% 4 or more - 1.25% Small City <sup>4</sup> - 1.25% Affordable Rental: First \$150,000 - .75% Over \$150,000 - .25%	1 unit - 1st \$500,000 - 1.00% Over \$500,000 - 1.25% 2-3 units - 1.25% 4 or more - 1.25% Small City <sup>4</sup> - 1.25% Affordable Rental: First \$162,000 - .75% Over \$162,000 - .25%
Industrial/Commercial/Utility <sup>5</sup>	First \$150,000 - 1.50% Over \$150,000 - 2.00%	First \$150,000 - 1.50% Over \$150,000 - 2.00%	First \$150,000 - 1.50% Over \$150,000 - 2.00%

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<sup>1</sup> A residential property qualifies as "homestead" if it is occupied by the owner or a relative of the owner on the assessment date.

<sup>2</sup> Applies to land and buildings. Exempt from referendum market value tax.

<sup>3</sup> Exempt from referendum market value tax.

<sup>4</sup> Cities of 5,000 population or less and located entirely outside the seven-county metropolitan area and the adjacent nine-county area and whose boundaries are 15 miles or more from the boundaries of a Minnesota city with a population of over 5,000.

<sup>5</sup> The estimated market value of utility property is determined by the Minnesota Department of Revenue.

## CURRENT PROPERTY VALUATIONS

2020/21 Economic Market Value \$1,684,589,538<sup>1</sup>

### 2020/21 Assessor's Estimated Market Value

	<b>Becker County</b>	<b>Clay County</b>	<b>Otter Tail County</b>	<b>Total</b>
Real Estate	\$1,500,293,800	\$37,440,000	\$50,522,700	\$1,588,256,500
Personal Property	7,518,700	76,300	1,400	7,596,400
Total Valuation	<u><u>\$1,507,812,500</u></u>	<u><u>\$37,516,300</u></u>	<u><u>\$50,524,100</u></u>	<u><u>\$1,595,852,900</u></u>

### 2020/21 Net Tax Capacity

	<b>Becker County</b>	<b>Clay County</b>	<b>Otter Tail County</b>	<b>Total</b>
Real Estate	\$13,803,170	\$336,674	\$523,850	\$14,663,694
Personal Property	143,482	1,526	28	145,036
Net Tax Capacity	\$13,946,652	\$338,200	\$523,878	\$14,808,730
Less: Captured Tax Increment Tax Capacity <sup>2</sup>	(1,480)	0	0	(1,480)
Taxable Net Tax Capacity	<u><u>\$13,945,172</u></u>	<u><u>\$338,200</u></u>	<u><u>\$523,878</u></u>	<u><u>\$14,807,250</u></u>

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<sup>1</sup> According to the Minnesota Department of Revenue, the Assessor's Estimated Market Value (the "AEMV") for the District is about 91.50% of the actual selling prices of property most recently sold in the District. The sales ratio was calculated by comparing the selling prices with the AEMV. Dividing the AEMV of real estate by the sales ratio and adding the AEMV of personal property and utility, railroads and minerals, if any, results in an Economic Market Value ("EMV") for the District of \$1,684,589,538.

<sup>2</sup> The captured tax increment value shown above represents the captured net tax capacity of tax increment financing districts located in the District.

## 2020/21 NET TAX CAPACITY BY CLASSIFICATION

	<b>2020/21 Net Tax Capacity</b>	<b>Percent of Total Net Tax Capacity</b>
Residential homestead	\$4,345,323	29.34%
Agricultural	2,985,642	20.16%
Commercial/industrial	737,262	4.98%
Public utility	211,290	1.43%
Non-homestead residential	896,894	6.06%
Commercial & residential seasonal/rec.	5,487,283	37.05%
Personal property	145,036	0.98%
<b>Total</b>	<b><u>\$14,808,730</u></b>	<b><u>100.00%</u></b>

## TREND OF VALUATIONS

<b>Levy Year</b>	<b>Assessor's Estimated Market Value</b>	<b>Assessor's Taxable Market Value</b>	<b>Net Tax Capacity<sup>1</sup></b>	<b>Taxable Net Tax Capacity<sup>2</sup></b>	<b>Percent increase/decrease in Estimated Market Value</b>
2016/17	\$1,319,156,100	\$1,213,133,600	\$11,781,604	\$11,781,604	4.90%
2017/18	1,374,697,500	1,274,190,100	12,465,105	12,465,105	4.21%
2018/19	1,460,006,800	1,359,785,800	13,320,663	13,320,663	6.21%
2019/20	1,538,121,000	1,437,690,200	14,262,393	14,262,393	5.35%
2020/21	1,595,852,900	1,486,637,900	14,808,730	14,807,250	3.75%

<sup>1</sup> Net Tax Capacity includes tax increment values.

<sup>2</sup> Taxable Net Tax Capacity does not include tax increment values.

## LARGER TAXPAYERS

Taxpayer	Type of Property	2020/21 Net Tax Capacity	Percent of District's Total Net Tax Capacity
Burlington Northern	Commercial	\$205,432	1.39%
Mattson Farms, Inc.	Agricultural	181,776	1.23%
Minnkota Power Coop	Utility	137,900	0.93%
Western Minnesota Municipal	Utility	92,554	0.63%
Individual	Agricultural	59,854	0.40%
Greater Minnesota Gas	Commercial	48,944	0.33%
Ottertail Power Company	Commercial	39,692	0.27%
Community Coops of Lake Park	Commercial	30,068	0.20%
Audubon Engineering	Commercial	26,468	0.18%
Individual	Agricultural	<u>25,202</u>	<u>0.17%</u>
Total		<u><u>\$847,890</u></u>	<u><u>5.73%</u></u>

District's Total 2020/21 Net Tax Capacity      \$14,808,730

**Source:** Current Property Valuations, Net Tax Capacity by Classification, Trend of Valuations and Larger Taxpayers have been furnished by Becker, Clay and Otter Tail Counties.

# **DEBT**

## **DIRECT DEBT<sup>1</sup>**

### **General Obligation Debt (see schedule following)**

Total G.O. debt secured by taxes and state aids <sup>2</sup> (includes the Bonds)*	<u>\$30,270,000</u>
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### **Other Obligations**

Lake Agassiz Education Cooperative No. 0397-52, Hawley, Minnesota, A Minnesota Joint Powers Entity issued \$4,505,000 Certificates of Participation, Series 2020A, dated September 30, 2020. The District is obligated to pay a portion of this debt.

\*Preliminary, subject to change.

## **STATE AID FOR DEBT SERVICE**

The Minnesota Debt Service Equalization program provides state aid to finance a portion of the principal and interest payments on most school district bonds. Bonds and Certificates not eligible for the program include all alternative facilities bonds, facilities maintenance bonds, capital facilities bonds, OPEB bonds, building bonds with relatively short maturities, and Certificates of Participation (COPs).

Under the Debt Service Equalization Formula (the Formula) adopted by the 2001 Minnesota State Legislature, each school district is responsible for the amount of its qualifying annual debt service which is equal to 15.74% of its Adjusted Net Tax Capacity (ANTC). The District does not currently qualify for debt service equalization aid.

In addition to debt service equalization aid, some school districts will qualify for state Long Term Facilities Maintenance Aid to finance a portion of the payments on Alternative Facilities Bonds and Facilities Maintenance Bonds, pursuant to the Long Term Facilities Maintenance Revenue (LTFMR) program approved by the State in 2015. If any aid is received, it is deposited into the District's debt service fund and must be used for payments on the bonds; any payment of state aid into the debt service fund causes a reduction in the tax levy for Alternative Facilities Bonds and Facilities Maintenance Bonds. The amount of aid received in the debt service fund will vary each year, depending on a number of factors. The District does not currently qualify for Long Term Facilities Maintenance Aid in the debt service fund.

Some school districts will also receive aid for debt service payments through the state School Building Bond Agricultural Credit, which is paid to school districts to offset a portion of certain bond levies (Minn. Stat. Section 273.1387). The reimbursement percentages are 60% for taxes payable in 2022, and 70% for 2023 and thereafter. The school building bond agricultural credit applies to farmland, excluding the house, garage and one acre, and to rural vacant land and managed forest land. The amount of agricultural credit received in the debt service fund for taxes payable 2022 is approximately 10.2% of total annual debt service levies, based on the District's 2020/21 qualifying agricultural land valuation.

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<sup>1</sup> Outstanding debt is as of the dated date of the Bonds.

<sup>2</sup> Based upon the agricultural land valuation and current statistics, the District anticipates a portion of this debt will be paid by the State of Minnesota.

**Independent School District No. 2889 (Lake Park Audubon), Minnesota**  
**Schedule of Bonded Indebtedness**  
**General Obligation Debt Secured by Taxes**  
**(As of 02/17/2022)**

Taxable School Building Bonds Series 2010A (QSCB)			School Building Refunding Bonds Series 2016A			School Building Bonds Series 2022A		
Dated Amount	07/22/2010 \$17,350,000	02/01	05/19/2016 \$910,000	02/01	02/17/2022 \$22,960,000*	02/01	02/01	02/01
Fiscal Year Ending	Principal	Interest	Principal	Interest	Principal	Estimated Interest	Total Principal	Total Interest
2023	1,300,000	335,750	0	20,475	0	714,947	1,300,000	1,071,172
2024	1,300,000	270,750	0	20,475	0	748,200	1,300,000	1,039,425
2025	1,300,000	204,125	0	20,475	0	748,200	1,300,000	972,800
2026	1,300,000	135,875	0	20,475	0	748,200	1,300,000	904,550
2027	1,200,000	66,000	0	20,475	40,000	748,200	1,240,000	834,675
2028		910,000	20,475	340,000	746,200	1,250,000	2,016,675	22,580,000
2029			1,245,000	729,200	1,245,000	729,200	2,974,200	21,335,000
2030			1,345,000	666,250	1,345,000	666,950	2,011,950	19,990,000
2031			1,410,000	599,700	1,410,000	599,700	2,009,700	18,580,000
2032			1,450,000	557,400	1,450,000	557,400	2,007,400	17,130,000
2033			1,490,000	513,900	1,490,000	513,900	2,003,900	15,640,000
2034			1,540,000	469,200	1,540,000	469,200	2,009,200	14,100,000
2035			1,585,000	423,000	1,585,000	423,000	2,008,000	12,515,000
2036			1,635,000	375,450	1,635,000	375,450	2,010,450	10,880,000
2037			1,680,000	326,400	1,680,000	326,400	2,006,400	9,200,000
2038			1,735,000	276,000	1,735,000	276,000	2,011,000	7,465,000
2039			1,785,000	223,950	1,785,000	223,950	2,008,950	5,680,000
2040			1,840,000	170,400	1,840,000	170,400	2,010,400	3,840,000
2041			1,890,000	115,200	1,890,000	115,200	2,005,200	1,950,000
2042			1,950,000	58,500	1,950,000	58,500	2,008,500	58,500
	6,400,000	1,012,500	910,000	122,850	30,270,000	9,959,197	11,094,547	41,364,547

\* Preliminary, subject to change.

## BONDED DEBT LIMIT

Minnesota Statutes, Section 475.53, subdivision 4, presently limits the "net debt" of a school district to 15% of the estimated market value of all taxable property situated within its corporate limits. The estimated market value of property within a district, on which its debt limit is based, is (a) the value certified by the county auditors, or (b) this value divided by the ratio certified by the commissioner of revenue, whichever results in a higher value. The current debt limit of the District is computed as follows:

2020/21 Economic Market Value	\$1,684,589,538
Multiply by 15%	0.15
Statutory Debt Limit	\$252,688,431
Less: Long-Term Debt Outstanding Being Paid Solely from Taxes (includes the Bonds)*	(30,270,000)
Unused Debt Limit*	<u><u>\$222,418,431</u></u>

\*Preliminary, subject to change.

## OVERLAPPING DEBT<sup>1</sup>

Taxing District	2020/21 Taxable Net Tax Capacity	% In District	Total G.O. Debt <sup>2</sup>	District's Proportionate Share
Counties of:				
Becker	\$63,297,646	22.0311%	\$10,070,000	\$2,218,532
Clay	70,641,581	0.4788%	55,440,000	265,447
Otter Tail	106,807,733	0.4905%	27,620,000	135,476
City of:				
Audubon	298,177	100.0000%	1,005,000	<u><u>1,005,000</u></u>
District's Share of Total Overlapping Debt				
				<u><u>\$3,624,455</u></u>

## DEBT PAYMENT HISTORY

The District has no record of default in the payment of principal and interest on its debt.

<sup>1</sup> Overlapping debt is as of the dated date of the Bonds. Only those taxing jurisdictions with general obligation debt outstanding are included in this section. It does **not** include non-general obligation debt, self-supporting general obligation revenue debt, short-term general obligation debt, or general obligation tax/aid anticipation certificates of indebtedness.

<sup>2</sup> Outstanding debt is based on information in Official Statements obtained on EMMA and the Municipal Advisor's records.

## DEBT RATIOS

	G.O. Debt	Debt/Economic Market Value (\$1,684,589,538)	Debt/ Current Population Estimate (5,664)
Direct G.O. Debt Secured By Taxes and State Aids (includes the Bonds)*	\$30,270,000	1.80%	\$5,344.28
Less: State Agricultural Credit <sup>1</sup>	<u>(3,087,540)</u>		
Tax Supported General Obligation Debt*	\$27,182,460	1.61%	\$4,799.16
 District's Share of Total Overlapping Debt	 <u>\$3,624,455</u>	 0.22%	 <u>\$639.91</u>
 Total*	 <u>\$30,806,915</u>	 1.83%	 <u>\$5,439.07</u>

\*Preliminary, subject to change.

## FUTURE FINANCING

The District has no current plans for additional financing in the next 12 months.

## LEVY LIMITS

Minnesota school district tax levies for most purposes are subject to statutory limitations. No limit, however, is placed on the debt service levy, and districts are required to levy 105% of actual principal and interest requirements to allow for delinquencies.

School districts receive a basic revenue amount per pupil unit from aid and levy proceeds in a variety of categorical state aids. They are also allowed to certify additional levies within limits for certain specified purposes. The State Department of Education and the applicable County Auditors review the levies of each school district to determine compliance with state levy limits.

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<sup>1</sup> Based on current State law and statistics, the State of Minnesota is estimated to pay approximately 10.2% of the principal and interest of the District's general obligation bonds. Assuming this percentage continues for the life of the issue, the State's proportionate share of principal is \$3,087,540.

## TAX RATES, LEVIES AND COLLECTIONS

### TAX LEVIES AND COLLECTIONS

Tax Year	Net Tax Levy <sup>1</sup>	Total Collected Following Year	Collected to Date <sup>2</sup>	% Collected
2016/17	\$2,511,457	\$2,465,305	\$2,511,043	99.98%
2017/18	2,325,338	2,288,017	2,324,065	99.95%
2018/19	2,492,038	2,453,428	2,485,004	99.72%
2019/20	2,608,493	2,569,142	2,593,020	99.41%
2020/21	2,663,747	In process of collection		

Property taxes are collected in two installments in Minnesota--the first by May 15 and the second by October 15.<sup>3</sup> Mobile home taxes are collectible in full by August 31. Minnesota Statutes require that levies (taxes and special assessments) for debt service be at least 105% of the actual debt service requirements to allow for delinquencies.

The spread of COVID-19 and responses taken by the United States government, state governments, local governments and private industries have caused significant disruptions to the national and State economy. See "RISK FACTORS - Impact of the Spread of COVID-19" herein. Certain states have announced extended deadlines for payment of property taxes, although as of this date Minnesota has not taken such measures. The District cannot predict whether and how much payment of property taxes will be impacted. Any delays or reduction in the receipt of property taxes may materially adversely impact the District's finances and payment of debt obligations, including the Bonds.

<sup>1</sup> This reflects the Final Levy Certification of the District after all adjustments have been made.

<sup>2</sup> Collections are through May 31, 2021 for Becker, through May 17, 2021 for Clay and through June 30, 2021 for Otter Tail Counties.

<sup>3</sup> Second half tax payments on agricultural property are due on November 15th of each year.

## TAX CAPACITY RATES<sup>1</sup>

	2016/17	2017/18	2018/19	2019/20	2020/21
I.S.D. No. 2889 (Lake Park Audubon)	14.513%	13.735%	13.318%	13.312%	13.197%
Becker County	39.863%	38.516%	37.732%	36.752%	36.243%
Clay County	46.477%	47.888%	48.859%	51.180%	52.322%
Otter Tail County	41.858%	42.296%	41.561%	41.882%	40.773%
City of Audubon	97.262%	98.429%	94.819%	90.090%	88.072%
City of Lake Park	40.373%	35.146%	36.073%	33.587%	35.801%
Town of Lake Park <sup>2</sup>	12.612%	10.719%	10.245%	9.319%	8.991%
Becker County EDA	0.239%	0.223%	0.211%	0.207%	0.199%
Buffalo Watershed	1.747%	1.686%	1.659%	1.664%	1.770%
Cormorant Watershed	2.223%	1.965%	1.674%	1.590%	1.489%
Otter Tail County HRA	0.674%	0.693%	1.307%	1.373%	1.541%
Pelican Lake Improvement District	2.423%	2.405%	2.227%	2.108%	2.048%
Pelican River Watershed	1.510%	1.364%	1.195%	1.078%	1.026%
Pelican Valley Hospital	2.377%	4.000%	4.684%	4.480%	4.241%
Wild Rice Watershed	5.016%	6.424%	6.359%	4.614%	4.842%

### *Referendum Market Value Rates:*

I.S.D. No. 2889 (Lake Park Audubon)	0.17022%	0.13865%	0.14846%	0.13777%	0.13294%
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**Source:** Tax Levies and Collections and Tax Capacity Rates have been furnished by Becker, Clay and Otter Tail Counties.

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<sup>1</sup> After reduction for state aids. Does not include the statewide general property tax against commercial/industrial, non-homestead resorts and seasonal recreational residential property.

<sup>2</sup> Representative town rate.

## **THE ISSUER**

### **EMPLOYEES**

The District is governed by an elected school board and employs a staff of 118, including 55 non-licensed employees and 63 licensed employees (60 of whom are teachers). The District provides education for 733 students in grades kindergarten through twelve.

### **PENSIONS; UNIONS**

#### **Teachers' Retirement Association (TRA)**

All teachers employed by the District are covered by defined benefit pension plans administered by the State of Minnesota Teachers Retirement Association (TRA). TRA members belong to either the Coordinated Plan or the Basic Plan. Coordinated members are covered by Social Security and Basic members are not. All new members must participate in the Coordinated Plan. These plans are established and administered in accordance with Minnesota Statutes, Chapters 354 and 356.

#### **Public Employees' Retirement Association (PERA)**

All full-time and certain part-time employees of the District (other than those covered by TRA) are covered by a defined benefit plan administered by the Public Employees' Retirement Association of Minnesota (PERA). PERA administers the General Employees Retirement Fund (GERF) which is a cost-sharing, multiple-employer retirement plan. This plan is established and administered in accordance with Minnesota Statutes, Chapters 353 and 356.

#### **Recognized and Certified Bargaining Units**

Bargaining Unit	Expiration Date of Current Contract
Lake Park Audubon Principals Association	June 30, 2022
Lake Park Audubon Education Association	June 30, 2021
MSEA	June 30, 2023

#### **Status of Contracts**

The contract which expired on June 30, 2021 is currently in negotiations.

### **POST EMPLOYMENT BENEFITS**

The District has obligations for some post-employment benefits for its employees. Accounting for these obligations is dictated by Governmental Accounting Standards Board Statement No. 75 (GASB 75). The District's most recent Financial Statements (Audit) shows a total OPEB liability of \$774,827 as of July 1, 2020. The District has been funding these obligations on a pay-as-you-go basis.

**Source:** The District's most recent Audit.

## **STUDENT BODY**

The number of students enrolled for the past four years and for the current year have been as follows:

<b>Year</b>	<b>Kindergarten</b>	<b>Grades 1-6</b>	<b>Grades 7-12</b>	<b>Total</b>
2016/17	43	333	319	695
2017/18	53	342	321	716
2018/19	57	338	336	731
2019/20	38	332	331	701
2020/21	50	334	349	733

Enrollments for the next three years are projected to be as follows:

<b>Year</b>	<b>Kindergarten</b>	<b>Grades 1-6</b>	<b>Grades 7-12</b>	<b>Total</b>
2021/22	50	340	350	740
2022/23	50	343	352	745
2023/24	50	346	354	750

## **SCHOOL BUILDINGS**

<b>School Building</b>	<b>Year Constructed</b>	<b>Years of Additions/ Remodelings</b>
Lake Park Audubon Elementary	1955	1970, 1977, 2011
Lake Park Audubon High School	2012	--

## **FUNDS ON HAND** (as of November 30, 2021)

<b>Fund</b>	<b>Total Cash and Investments</b>
General	\$3,306,517
Food Service	218,237
Community Service	(309,473)
Debt Service	1,059,178
<b>Total Funds on Hand</b>	<b><u>\$4,274,459</u></b>

## **LITIGATION**

There is no litigation threatened or pending questioning the organization or boundaries of the District or the right of any of its officers to their respective offices or in any manner questioning their rights and power to execute and deliver the Bonds or otherwise questioning the validity of the Bonds.

## **MUNICIPAL BANKRUPTCY**

Municipalities are prohibited from filing for bankruptcy under Chapter 11 (reorganization) or Chapter 7 (liquidation) of the U.S. Bankruptcy Code (11 U.S.C. §§ 101-1532) (the "Bankruptcy Code"). Instead, the Bankruptcy Code permits municipalities to file a petition under Chapter 9 of the Bankruptcy Code, but only if certain requirements are met. These requirements include that the municipality must be "specifically authorized" under State law to file for relief under Chapter 9. For these purposes, "State law" may include, without limitation, statutes of general applicability enacted by the State legislature, special legislation applicable to a particular municipality, and/or executive orders issued by an appropriate officer of the State's executive branch.

Currently there is no statutory authority for Minnesota school districts to file for bankruptcy relief under Chapter 9 of the Bankruptcy Code.

Nevertheless, there can be no assurance (a) that State law will not change in the future while the Bonds are outstanding; or (b) even absent such a change in State law, that an executive order or other executive action could not effectively authorize the District to file for relief under Chapter 9; or (c) whether it would still be eligible for voluntary or involuntary relief under Chapters of the Bankruptcy Code other than Chapter 9 or under similar federal or state law or equitable proceeding regarding insolvency or providing for protection from creditors. Such action could impact the rights of holders of the Bonds. Such modifications could be adverse to holders of the Bonds and there could ultimately be no assurance that holders of the Bonds would be paid in full or in part on the Bonds.

## SUMMARY GENERAL FUND INFORMATION

Following are summaries of the revenues and expenditures and fund balances for the District's General Fund. These summaries are not purported to be the complete audited financial statements of the District, and potential purchasers should read the included financial statements in their entirety for more complete information concerning the District. Copies of the complete statements are available upon request. Appendix A includes the District's 2021 audited financial statements.

COMBINED STATEMENT	FISCAL YEAR ENDING DECEMBER 31				2021-22 Adopted Budget 1)
	2018 Audited	2019 Audited	2020 Audited	2021 Audited	
Revenues					
Local property taxes	\$1,137,272	\$1,081,517	\$1,234,117	\$1,303,497	\$1,352,750
Earnings on investment	415,202	499,163	336,137	343,866	100,000
Revenues from state sources	5,923,064	6,569,184	6,501,813	6,500,504	6,478,454
Revenues from federal sources	115,835	125,761	139,932	519,345	130,000
<b>Total Revenues</b>	<b>\$7,591,373</b>	<b>\$8,275,625</b>	<b>\$8,211,999</b>	<b>\$8,667,212</b>	<b>\$8,061,204</b>
Expenditures					
Current:					
Administration	\$545,697	\$557,848	\$582,333	\$583,720	\$637,140
District support services	190,389	202,883	204,337	199,041	206,621
Elementary & secondary regular instruction	3,269,888	3,407,906	3,271,055	3,424,854	3,338,033
Vocational education instruction	314,796	285,297	261,350	253,496	185,812
Special education instruction	1,046,329	1,058,452	1,117,035	1,348,680	1,268,937
Instructional support services	513,660	407,388	361,938	451,616	459,571
Pupil support services	494,801	492,267	509,831	590,095	652,832
Sites and buildings	822,100	991,393	804,988	691,846	874,300
Fiscal and other fixed cost programs	52,686	54,643	56,770	63,452	94,356
Capital outlay	123,321	358,914	147,157	260,686	125,000
<b>Total Expenditures</b>	<b>\$7,373,667</b>	<b>\$7,816,991</b>	<b>\$7,316,794</b>	<b>\$7,867,486</b>	<b>\$7,842,602</b>
<b>Excess of revenues over (under) expenditures</b>	<b>\$217,706</b>	<b>\$458,634</b>	<b>\$895,205</b>	<b>\$799,726</b>	<b>\$218,602</b>
<b>Other Financing Sources (Uses)</b>					
Sale of capital assets	\$0	\$200	\$0	\$2,181	\$0
Operating transfers in/out	0	(128,351)	(110,000)	(110,000)	(110,000)
<b>Total Other Financing Sources (Uses)</b>	<b>\$0</b>	<b>(\$128,151)</b>	<b>(\$110,000)</b>	<b>(\$107,819)</b>	<b>(\$110,000)</b>
<b>Net changes in Fund Balances</b>	<b>\$217,706</b>	<b>\$330,483</b>	<b>\$785,205</b>	<b>\$691,907</b>	<b>\$108,602</b>
General Fund Balance July 1	\$1,086,931	\$1,304,637	\$1,635,120	\$2,420,325	\$3,112,232
Prior Period Adjustment	0	0	0	0	0
Residual Equity Transfer in (out)	0	0	0	0	0
General Fund Balance June 30	\$1,304,637	\$1,635,120	\$2,420,325	\$3,112,232	\$3,220,834
<b>DETAILS OF DECEMBER 31 FUND BALANCE</b>					
Nonspendable	\$168,249	\$89,464	\$0	\$0	\$0
Restricted	425,336	260,603	590,230	723,599	781,745
Assigned	194,204	195,608	0	0	0
Unassigned	516,848	1,089,445	1,830,095	2,388,633	2,439,089
<b>Total</b>	<b>\$1,304,637</b>	<b>\$1,635,120</b>	<b>\$2,420,325</b>	<b>\$3,112,232</b>	<b>\$3,220,834</b>

1) The 2021-22 budget was adopted on June 28, 2021.

## GENERAL INFORMATION

### LOCATION

The District, with a 2010 U.S. Census population of 4,903, and a current population estimate of 5,664 and comprising an area of 220 square miles, is located approximately 35 miles east of the Fargo-Moorhead metropolitan area and approximately 200 miles northwest of the Minneapolis-St. Paul metropolitan area.

### LARGER EMPLOYERS<sup>1</sup>

Larger employers in the District include the following:

Firm	Type of Business/Product	Estimated No. of Employees
TEAM Industries	Design/manufacture power-train and chassis components	125
I.S.D. No. 2889 (Lake Park Audubon)	Elementary and secondary education	118
R & R Transportation	Trucking transportation company	80
Sunnyside Care Center	Nursing home & home health services	50
Community Co-Op	Convenience store, propane sales and auto/furnace repair	33
Baer Brothers	Eggs wholesale	25
Pit 611 Sports Bar Grill	Bar	24
Trans Continental Leasing	Trucking	23
Casey's General Store	Convenience stores	15
Med-Pac, Inc.	Hospital equipment and supplies	12

**Source:** *Data Axle Reference Solutions, written and telephone survey (December 2021), and the Minnesota Department of Employment and Economic Development.*

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<sup>1</sup> This does not purport to be a comprehensive list and is based on available data obtained through a survey of individual employers, as well as the sources identified above. Some employers do not respond to inquiries for employment data. Estimates provided are accurate as of the date noted and may not reflect changes in the number of employees resulting from the current COVID-19 pandemic. (See "Risk Factors - Impact of the Spread of COVID-19").

## U.S. CENSUS DATA

**Population Trend:** The District

2000 U.S. Census population	4,350
2010 U.S. Census population	4,903
2020 Population Estimate	5,664
Percent of Change 2000 - 2010	12.71%

### Income and Age Statistics

	The District	Becker County	State of Minnesota	United States
2019 per capita income	\$35,318	\$31,729	\$37,625	\$34,103
2019 median household income	\$68,352	\$60,284	\$71,306	\$62,843
2019 median family income	\$77,721	\$71,902	\$89,842	\$77,263
2019 median gross rent	\$671	\$731	\$977	\$1,062
2019 median value owner occupied units	\$240,900	\$198,400	\$223,900	\$217,500
2019 median age	47.7 yrs.	41.9 yrs.	38.0 yrs.	38.1 yrs.
		State of Minnesota	United States	
District % of 2019 per capita income		93.87%		103.56%
District % of 2019 median family income		86.51%		100.59%

**Source:** *2000 and 2010 Census of Population and Housing, and 2019 American Community Survey (Based on a five-year estimate), U.S. Census Bureau (<https://data.census.gov/cedsci>).*

## EMPLOYMENT/UNEMPLOYMENT DATA

Rates are not compiled for individual communities within counties.

Year	<u>Average Employment</u>		<u>Average Unemployment</u>	
	Becker County	Becker County	Becker County	State of Minnesota
2017	17,799		4.1%	3.4%
2018	17,930		3.6%	3.0%
2019	18,196		4.0%	3.2%
2020	17,753		5.8%	6.2%
2021, November	18,467		2.2%	2.2%

**Source:** Minnesota Department of Employment and Economic Development.

## **APPENDIX A**

### **FINANCIAL STATEMENTS**

Potential purchasers should read the included financial statements in their entirety for more complete information concerning the District's financial position. Such financial statements have been audited by the Auditor, to the extent and for the periods indicated thereon. The District has not requested or engaged the Auditor to perform, and the Auditor has not performed, any additional examination, assessments, procedures or evaluation with respect to such financial statements since the date thereof or with respect to this Preliminary Official Statement, nor has the District requested that the Auditor consent to the use of such financial statements in this Preliminary Official Statement. Although the inclusion of the financial statements in this Preliminary Official Statement is not intended to demonstrate the fiscal condition of the District since the date of the financial statements, in connection with the issuance of the Bonds, the District represents that there have been no material adverse change in the financial position or results of operations of the District, nor has the District incurred any material liabilities, which would make such financial statements misleading.

Copies of the complete audited financial statements for the past three years and the current budget are available upon request from Ehlers.



Financial Statements  
June 30, 2021

**Independent School District No. 2889  
Lake Park - Audubon Area Public Schools**

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
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 Lake Park - Audubon Area Public Schools  
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CPAs & BUSINESS ADVISORS

## Opinions

In our opinion, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities and each major fund of the District, as of June 30, 2021, and the respective changes in financial position and the respective budgetary comparison for the general fund for the year then ended in accordance with accounting principles generally accepted in the United States of America.

## Independent Auditor's Report

### Other Matters

To the School Board of  
Independent School District No. 2889  
Lake Park-Audubon Area Public Schools  
Lake Park, Minnesota

#### Report on the Financial Statements

We have audited the accompanying financial statements of the governmental activities and each major fund of Independent School District No. 2889, Lake Park-Audubon, Minnesota, (the "District") as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

#### Management's Responsibility for the Financial Statements

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

#### Auditor's Responsibility

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

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

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

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Management's Discussion and Analysis  
June 30, 2021

The schedule of expenditures of federal awards, schedule of changes in UFARS fund balances – general fund and uniform financial accounting and reporting standards compliance table are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion the schedule of expenditures of federal awards, schedule of changes in UFARS fund balances – general fund, and uniform financial accounting and reporting standards compliance table are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

The school board and administration has not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we do not express an opinion or provide any assurance on it.

**Other Reporting Required by Government Auditing Standards**

In accordance with *Government Auditing Standards*, we have also issued our report dated November 22, 2021 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the District's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.

**Report on Other Legal and Regulatory Requirements**

In accordance with the legal Compliance Audit Guide prepared by the Office of the State Auditor pursuant to Minn. Stat. §6.65, we have also issued a report dated November 22, 2021 on our consideration of the District's compliance with aspects of the provisions of the Minnesota Legal Compliance Audit Guide for School Districts. The purpose of that report is to describe the scope of our testing of compliance and the results of that testing, and not directed primarily toward obtaining knowledge of noncompliance. That report is an integral part of procedures performed in accordance with the Office of the State Auditor's Minnesota Legal Compliance Audit Guide for School Districts in considering the District's compliance with certain regulatory requirements pursuant to Minn. Stat. §6.65.

*Carey Saulty L.L.P.*

Fargo, North Dakota  
November 22, 2021

- General fund revenues were \$8,667,212 while expenditures totaled \$7,867,486.
- The General fund unassigned fund balance increased \$506,017 resulting in a total of \$2,388,633.
- The Debt service fund balance decreased by \$225,835 to a total of \$25,112.
- The Food service fund balance increased by \$68,549 to a total of \$219,475.
- The Community Service fund deficit decreased by \$60,696 to a total fund deficit of \$295,100.

**Overview of the Financial Statements**

The financial section of the annual report consists of three parts – Independent Auditor's Report, required supplementary information which includes the management's discussion and analysis (this section) and the basic financial statements. The basic financial statements include two kinds of statements that present different views of the District:

- The first two statements are district-wide financial statements that provide both short-term and long-term information about the District's overall financial status.
- The remaining statements are fund financial statements that focus on individual parts of the District, reporting the District's operations in more detail than the district-wide statements.
- The Governmental funds statements tell how basic services such as regular and special education were financed in the short term as well as what remains for future spending.

The financial statements also include notes that explain some of the information in the statements and provide more detailed data. The following outline shows how the various parts of this annual report are arranged and related to one another.

- A. Management's Discussion and Analysis
- B. Basic Financial Statements
  1. District-Wide Financial Statements
  2. Fund Financial Statements

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
 Management's Discussion and Analysis  
 June 30, 2021

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Footnote 1 summarizes the major features of the District's financial statements, including the portion of the District's activities they cover and the types of information they contain. The remainder of this overview section of management's discussion and analysis highlights the structure and contents of each of the statements.

**District-Wide Statements**

The district-wide statements report information about the District as a whole using accounting methods similar to those used by private-sector companies. The statement of net position includes all of the District's assets, deferred outflows of resources, liabilities, and deferred inflows of resources. All of the current year's revenues and expenses are accounted for in the statement of activities regardless of when cash is received or paid.

The two district-wide statements report the District's net position and how they have changed. Net position – the difference between the District's assets and deferred outflows of resources, and liabilities and deferred inflows of resources – is one way to measure the District's financial health or position.

- Over time, increases or decreases in the District's net position is an indicator of whether its financial position is improving or deteriorating, respectively.
- To assess the overall health of the District you need to consider additional non-financial factors such as changes in the District's property tax base and the condition of district buildings and other facilities.

In the district-wide financial statements the District's activities are shown in one category:

*Governmental Activities* – All of the District's basic services are included here, such as regular and special education, transportation, administration, food services, and community education. Property taxes and state aids finance all of these activities.

**Fund Financial Statements**

The fund financial statements provide more detailed information about the District's funds – focusing on its most significant or "major" funds – not the District as a whole. Funds are accounting devices the District uses to keep track of specific sources of funding and spending on particular programs:

- Some funds are required by State law and by bond covenants.
- The District establishes other funds to control and manage money for particular purposes (e.g., repaying its long-term debts) or to show that it is properly using certain revenues (e.g., federal grants).

The District has one kind of fund:  
*Governmental/Funds* – All of the District's basic services are included in governmental funds, which generally focus on:

1. how cash and other financial assets that can readily be converted to cash flow in and out and
2. the balances left at year-end that are available for spending.

Consequently, the governmental funds statements provide a detailed short-term view that helps to determine whether there are more or fewer financial resources that can be spent in the near future to finance the District's programs. Because this information does not encompass the additional long-term focus of the district-wide statements, we provide additional information at the bottom of the governmental funds statements that explains the relationship (or differences) between them.

**Financial Analysis of the District as a Whole**

Net position: The District's combined net position was a positive \$5,793,073 on June 30, 2021.

Statement of Net Position  
 June 30, 2021 and 2020

	2021	2020
<b>Assets</b>		
Current assets		
Capital assets	\$ 19,280,759	\$ 19,639,286
Total assets	25,711,429	25,379,796
<b>Deferred Outflows of Resources</b>		
<b>Liabilities</b>		
Other liabilities		
Long-term liabilities	14,532,579	15,255,882
Total liabilities	15,374,822	16,120,428
<b>Deferred Inflows of Resources</b>		
<b>Net Position</b>	<u>6,909,392</u>	<u>9,131,243</u>
Net investment in capital assets	10,670,759	9,729,286
Restricted for specific purposes	8,23,828	804,494
Unrestricted	(5,701,514)	(6,405,970)
<b>Total net position</b>	<u>\$ 5,793,073</u>	<u>\$ 4,127,810</u>

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
 Management's Discussion and Analysis  
 June 30, 2021

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
 Management's Discussion and Analysis  
 June 30, 2021

Statement of Activities		Years Ended June 30, 2021 and 2020	
		2021	2020
Revenues			
Program revenues	\$ 414,295	\$ 541,638	
Charges for service			1,486,453
Operating grants and contributions			
General			
Property taxes	2,609,052	2,478,411	
Aids and payments from state and other	6,421,415	6,021,110	
Unrestricted investment earnings			36,349
Miscellaneous revenues	109,521	167,315	
	<b>11,158,024</b>	<b>10,731,276</b>	
Total revenues			
Expenses			
Administration	583,720	582,333	
District support services	199,041	204,334	
Regular instruction	3,334,327	3,363,235	
Vocational education instruction	183,235	172,987	
Special education instruction	1,252,850	1,133,940	
Community education and services	318,809	273,006	
Instructional support services	638,020	658,964	
Pupil support services	1,266,341	1,187,060	
Sites and buildings	744,623	887,664	
Fiscal and other fixed-cost programs	971,795	1,026,906	
	<b>9,492,761</b>	<b>9,490,429</b>	
Total expenses			
Change in Net Position	1,665,263	1,240,847	
Net Position - Beginning	<b>4,127,810</b>	<b>2,886,963</b>	
Net Position - Ending	<b>\$ 5,793,073</b>	<b>\$ 4,127,810</b>	

**Financial Analysis of the District's Funds**

The financial performance of the District as a whole is reflected in its governmental funds. The District's governmental funds reported a combined fund balance of \$3,061,719. The District had an increase in the combined fund balance of \$595,317. Revenues for the District's governmental funds were \$11,130,641 while total expenditures were \$10,537,505.

**General Fund**

The General Fund includes the primary operations of the District in providing educational services to students from Pre-K/Special Education through grade 12 including pupil transportation activities and capital outlay projects.

The following schedule presents a summary of General Fund Revenues:

	Year Ended June 30,		Amount of Increase (Decrease)	Percent Increase (Decrease)
	2021	2020		
Local property taxes	\$ 1,303,497	\$ 1,234,117	\$ 69,380	5.6%
Other local sources	343,866	336,137	7,729	2.3%
State sources	6,500,504	6,501,813	(1,309)	0.0%
Federal sources	519,345	139,932	379,413	271.1%
Total General Fund revenues	<b>\$ 8,667,212</b>	<b>\$ 8,211,999</b>	<b>\$ 455,213</b>	<b>5.5%</b>

The revenue increased in the General Fund by \$455,213 or approximately 5.5% from the previous fiscal year. The change in local property taxes is result of Board-approved increases in the levied amounts. The increase in federal sources is due to funding related the COVID-19 pandemic.

*Changes in Net Position* – The District's total revenues were \$11,158,024 for the year ended June 30, 2021.

Property taxes and state formula aid accounted for 80.93% of total revenue for the year. The remainder came from other general revenues, investment earnings, and program revenues.

The total cost of all programs and services was \$9,492,761. The District's expenses are predominantly related to educating and caring for students. The purely administrative activities of the District accounted for 8.25% of the total expenses.

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
 Management's Discussion and Analysis  
 June 30, 2021

**Independent School District No. 2889**  
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 June 30, 2021

The following schedule presents a summary of General Fund expenditures:

	Year Ended June 30,		Amount of Increase (Decrease)	Percent Increase (Decrease)
	2021	2020		
Salaries and benefits	\$ 5,825,595	\$ 5,607,382	\$ 218,213	3.9%
Purchased services	970,725	999,287	(28,562)	-2.9%
Supplies and materials	657,537	463,063	195,474	42.3%
Capital expenditures	260,386	134,071	126,615	94.4%
Other expenditures	152,943	113,991	38,952	34.2%
<b>Total General Fund expenditures</b>	<b>\$ 7,867,486</b>	<b>\$ 7,316,794</b>	<b>\$ 550,692</b>	<b>7.5%</b>

Total General Fund expenditures increased \$550,692 or approximately 7.5% from the previous year. Salaries and benefits increased due to general wage increases. Supplies and materials increased due to the purchase of laptops. Capital expenditures increased due to the purchase of a bus and property adjacent to district facilities.

Board policy indicates the District should maintain a minimum General Fund unassigned fund balance in an amount which shall be no less than 6% of General Fund expenditures. The Unrestricted (assigned, and unassigned) fund balance of \$2,388,633 is 30.4% of the annual General Fund expenditures of \$7,867,486 at June 30, 2021.

#### General Fund Budgetary Highlights

The District's final general fund results when compared to the budget are:

- Actual revenues were \$604,621 more than budgeted.
- Actual expenditures were \$3,209 less than budgeted.

#### Debt Service Fund

- Expenditures exceeded revenues by \$225,835 in the Debt Service Fund.

#### Food Service Fund

- Revenues exceeded expenditures by \$68,549 in the Food Service Fund.

#### Community Service Fund

- Revenues and transfers from the general fund exceeded expenditures by \$60,696 in the Community Service Fund.
- Revenues and transfers from the general fund exceeded expenditures by \$60,696 in the Community Service Fund.

#### Capital Asset and Debt Administration

By the end of 2021, the District had invested \$26,588,143 in a broad range of capital assets, including district buildings, athletic facilities, computer and equipment. Total depreciation expense for fiscal year 2021 was \$612,962. See Note 5 to the financial statements for further information.

	Capital Assets		June 30, 2021 and 2020
	2021	2020	
Land	\$ 597,300	\$ 597,300	
Site improvements	487,789	396,542	
Building	23,225,967	23,225,967	
Equipment	2,277,087	2,121,177	
Accumulated depreciation	(7,307,384)	(6,701,700)	
<b>Total capital assets</b>	<b>\$ 19,280,759</b>	<b>\$ 19,639,286</b>	

#### Long-Term Liabilities

At year-end, the District had \$8,610,000 in general obligation bonds – a decrease of \$1,300,000 from prior year. The District also has \$10,667 in vacation payable, total OPEB obligations of \$774,827, and \$5,137,085 in net pension liability at June 30, 2021. See Notes 6, 7, and 8 to the financial statements for further information.

#### Factors Bearing on the District's Future

With the exception of the voter-approved operating referendum, the District is dependent on the State of Minnesota for its revenue authority. Recent experience demonstrates that legislated revenue increases have not been sufficient to meet instructional program needs and increased costs due to inflation.

With the continuation of the COVID-19 Pandemic the District has seen some changes in enrollment which directly impacts state aid funding. The District has been awarded, and continues to be awarded, COVID-19 federal grants in response to the pandemic. The District is planning on using those funds to support the school district as a whole during these uncertain times.

#### Contacting the District's Financial Management

This financial report is designed to provide our citizens, taxpayers, customers, and investors and creditors with a general overview of the District's finances and to demonstrate the District's accountability for the money it receives. If you have questions about this report or need additional financial information, contact the Superintendent's Office, Independent School District 2889, 611 Vigen Lane, Lake Park, Minnesota 56554.

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
 Statement of Net Position  
 June 30, 2021

Assets									
Cash and cash equivalents	\$ 4,538,784								
Receivables	1,288,343								
Current property taxes	27,710								
Delinquent property taxes	53,245								
Accounts	521,477								
Due from other governmental units	1,111								
Inventories									
Capital assets	6,430,670								
Land	597,300								
Improvements	487,789								
Buildings	23,225,967								
Equipment	2,277,087								
Less accumulated depreciation	(7,307,384)								
Total capital assets, net of depreciation	19,280,759								
Total assets	25,711,429								
Deferred Outflows of Resources									
Other post-employment benefits	95,744								
Pension plans	2,270,114								
Total deferred outflows of resources	2,365,858								
Liabilities									
Accounts payable	30,911								
Accrued interest payable	172,575								
Due to other governmental units	2,245								
Salaries payable	610,668								
Unearned revenue	25,844								
Long-term liabilities									
Due within one year - other than OPEB and pensions	1,310,667								
Due in more than one year - other than OPEB and pensions	7,310,000								
Due in more than one year - total other -postemployment benefits obligation	774,827								
Due in more than one year - net pension liability	5,137,085								
Total liabilities	15,374,822								
Deferred Inflows of Resources									
Other post-employment benefits	27,665								
Pension plans	4,210,154								
Property taxes levied for subsequent year	2,671,573								
Total deferred inflows of resources	6,909,392								
Net Position (Deficit)									
Net investment in capital assets	10,670,759								
Restricted for specific purposes	823,828								
Unrestricted	(5,701,514)								
Total net position	\$ 5,793,073								

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
 Statement of Net Position  
 Year Ended June 30, 2021

Program Revenues									
Operating Grants and Contributions									
Capital Grants and Contributions									
Net (Expense) Revenue and Changes in Net Position									
Governmental activities									
Administration	\$ 583,720								
District support services	199,041								
Regular instruction	3,334,327								
Vocational education instruction	183,235								
Special education instruction	125,250								
Community education and services	31,809								
Instructional support services	63,820								
Pupil support services	1,266,341								
Sites and buildings	744,623								
Fiscal and other fixed-cost programs	971,956								
Total governmental activities	\$ 9,492,761								
General Revenues									
Property taxes, levied for general purposes									
Property taxes, levied for community service									
Property taxes, levied for debt service									
Addition payments from state and federal sources									
County apportionment									
Unrestricted investment earnings									
Miscellaneous revenues									
Total general revenues	1,328,699								
Changes in Net Position									
Net Position - Beginning	7,166								
Net Position - Ending	6,370,362								
51,053									
2,411									
109,521									
9,142,399									
9,142,399									
1,665,263									
4,197,810									
\$ 5,793,073									

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
**Governmental Funds**  
**Balance Sheet**  
**June 30, 2021**

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
**Reconciliation of the Governmental Fund**  
**Balance Sheet to the Statement of Net Positions**  
**June 30, 2021**

	General	Debt Service	Food Service	Community Service	Totals	\$ 3,061,719
<b>Assets</b>						
Cash and cash equivalents	\$ 3,609,414	\$ 721,578	\$ 207,792	\$ -	\$ 4,538,784	
Receivables						
Current property taxes	593,810	658,646	-	35,887	1,288,343	
Delinquent property taxes	13,312	13,658	-	740	27,710	
Accounts	32,557	-	-	20,688	53,245	
Due from other governmental units	485,182	13,105	20,285	-	521,477	
Due from other funds	207,933	-	-	2,905	207,933	
Inventories	-	-	-	-	-	
Total assets	<u>\$ 4,942,208</u>	<u>\$ 1,406,987</u>	<u>\$ 229,188</u>	<u>\$ 60,220</u>	<u>\$ 6,638,603</u>	<u>(172,575)</u>
<b>Liabilities</b>						
Accounts payable						
Due to other governmental units	\$ 24,056	\$ -	\$ 3,469	\$ 3,386	\$ 30,911	
Due to other funds	2,245	-	-	-	2,245	
Salaries payable	562,681	-	-	207,933	207,933	
Unearned revenue	16,374	-	6,344	41,485	63,688	
Total liabilities	<u>605,356</u>	<u>-</u>	<u>-</u>	<u>9,713</u>	<u>9,713</u>	<u>25,844</u>
Deferred inflows of Resources						
Unavailable revenue - property taxes						
Property taxes levied for subsequent year	13,312	13,658	-	740	27,710	
Total deferred inflows of resources	<u>1,211,308</u>	<u>1,388,217</u>	<u>-</u>	<u>91,048</u>	<u>2,673,573</u>	<u>(14,532,579)</u>
Fund Balance (Deficit)						
Nonspendable						
Restricted	723,599	25,112	1,111	14,930	1,111	
Unassigned	2,388,633	-	218,644	(310,030)	982,005	
Total fund balance (deficit)	<u>3,112,232</u>	<u>25,112</u>	<u>219,475</u>	<u>(295,100)</u>	<u>3,061,719</u>	<u>3,061,719</u>
Total liabilities, deferred inflows of resources, and fund balance	<u>\$ 4,942,208</u>	<u>\$ 1,406,987</u>	<u>\$ 229,188</u>	<u>\$ 60,220</u>	<u>\$ 6,638,603</u>	

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
**Governmental Funds**  
**Statement of Revenues, Expenditures and Changes in Fund Balances**  
**Year Ended June 30, 2021**

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
**Reconciliation of the Statement of Revenues, expenditures,**  
**and Changes in Fund Balances of Governmental Funds to the Statement of Activities**  
**Year Ended June 30, 2021**

	General	Debt Service	Food Service	Community Service	Total	\$ 595,317
Revenues						
Local property tax levies	\$ 1,303,497	\$ 1,208,687	\$ 2,178	\$ 71,666	\$ 2,583,830	
Other local and county sources	343,866	130,439	773	163,239	509,283	
State sources	6,500,504	-	606,729	29,670	6,631,386	
Federal sources	519,345	217,013	-	4,930	1,347,567	
Sales and other conversion of assets	-	-	28,555	-	28,555	
Total revenues	<b>8,667,212</b>	<b>1,556,139</b>	<b>637,785</b>	<b>269,505</b>	<b>11,130,641</b>	
Expenditures						
Current						
Administration	583,720	-	-	-	583,720	
District support services	189,041	-	-	-	189,041	
Regular instruction	3,424,854	-	-	-	3,424,854	
Vocational education instruction	253,496	-	-	-	253,496	
Special education instruction	1,348,680	-	-	-	1,348,680	
Community education and service	-	-	-	-	-	
Instructional support services	451,616	-	-	-	451,616	
Pupil support services	590,095	-	569,236	-	1,159,331	
Sites and buildings	691,846	-	-	-	691,846	
Fiscal and other fixed cost programs	63,452	-	-	-	63,452	
Debt service	-	-	-	-	-	
Principal	1,300,000	-	-	-	1,300,000	
Interest and fees	481,974	-	-	-	481,974	
Capital outlay	-	-	-	-	-	
Regular instruction	9,740	-	-	-	9,740	
Special education instruction	53,424	-	-	-	53,424	
Community education and service	-	-	-	-	-	
Instructional support services	2,416	-	-	-	2,416	
Pupil support services	92,710	-	-	-	92,710	
Sites and buildings	102,396	-	-	-	102,396	
Total expenditures	<b>7,867,486</b>	<b>1,781,744</b>	<b>563,236</b>	<b>318,809</b>	<b>10,537,505</b>	
Excess (Deficiency) of Revenues Over (Under) Expenditures	<b>799,726</b>	<b>(225,835)</b>	<b>68,549</b>	<b>(49,304)</b>	<b>593,136</b>	
Other Financing Sources (Uses)						
Transfers in						
Transfers out						
Sale of capital assets	(110,000) 2,181	-	-	-	110,000 (110,000) 2,181	
Total other financing sources (uses)	<b>(107,819)</b>				<b>110,000</b>	
Net Change in Fund Balance	<b>691,907</b>	<b>(225,835)</b>	<b>68,549</b>	<b>60,696</b>	<b>595,317</b>	
Fund Balance (Deficit), Beginning of Year	<b>2,420,325</b>	<b>250,847</b>	<b>159,926</b>	<b>(355,756)</b>	<b>2,466,402</b>	
Fund Balance (Deficit), End of Year	<b>\$ 3,112,232</b>	<b>\$ 25,112</b>	<b>\$ 219,475</b>	<b>\$ (295,100)</b>	<b>\$ 3,061,719</b>	

Excess (Deficiency) of Revenues Over (Under) Expenditures	<b>799,726</b>	<b>(225,835)</b>	<b>68,549</b>	<b>(49,304)</b>	<b>593,136</b>	
Other Financing Sources (Uses)						
Transfers in						
Transfers out						
Sale of capital assets	(110,000) 2,181	-	-	-	110,000 (110,000) 2,181	
Total other financing sources (uses)	<b>(107,819)</b>				<b>110,000</b>	
Net Change in Fund Balance	<b>691,907</b>	<b>(225,835)</b>	<b>68,549</b>	<b>60,696</b>	<b>595,317</b>	
Fund Balance (Deficit), Beginning of Year	<b>2,420,325</b>	<b>250,847</b>	<b>159,926</b>	<b>(355,756)</b>	<b>2,466,402</b>	
Fund Balance (Deficit), End of Year	<b>\$ 3,112,232</b>	<b>\$ 25,112</b>	<b>\$ 219,475</b>	<b>\$ (295,100)</b>	<b>\$ 3,061,719</b>	

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
**Statement of Revenues, Expenditures and Changes in Fund Balance – Budget to Actual – General Fund**  
**Year Ended June 30, 2021**

	<u>Original Budget</u>	<u>Final Budget</u>	<u>Actual</u>	<u>Variance With Final Budget</u>
<b>Revenues</b>				
Local property tax levies	\$ 1,313,001	\$ 1,313,001	\$ 1,303,497	\$ (9,504)
Other local and county sources	185,396	185,396	343,866	158,470
State sources	6,448,194	6,448,194	6,500,504	52,310
Federal sources	116,000	116,000	519,345	403,345
<b>Total revenues</b>	<b>8,062,591</b>	<b>8,062,591</b>	<b>8,667,212</b>	<b>604,621</b>
<b>Expenditures</b>				
<b>Current</b>				
Administration	605,245	605,245	583,720	21,525
District support services	210,519	210,519	199,041	11,478
Regular instruction	3,283,818	3,283,818	3,424,854	(141,036)
Vocational education instruction	247,811	247,811	253,406	(5,685)
Special education instruction	1,220,341	1,220,341	1,348,680	(128,339)
Instructional support services	411,408	411,408	451,616	(40,208)
Pupil support services	579,726	579,726	590,095	(10,369)
Sites and buildings	874,978	874,978	691,846	183,132
Fiscal and other fixed cost programs	93,226	93,226	63,452	29,774
Capital outlay	187,798	187,798	9,740	178,058
Regular instruction	65,930	65,930	53,424	(53,424)
Special education instruction	82,824	82,824	2,416	63,514
Instructional support services	7,071	7,071	92,710	(9,886)
Pupil support services			102,336	(95,325)
Total expenditures	<b>7,870,695</b>	<b>7,870,695</b>	<b>7,867,486</b>	<b>3,209</b>
<b>Excess of Revenues Over Expenditures</b>	<b>191,896</b>	<b>191,896</b>	<b>799,726</b>	<b>607,830</b>
<b>Other Financing Sources (Uses)</b>				
Transfer out	(110,000)	(110,000)	(110,000)	-
Sale of capital assets	-	-	2,181	2,181
<b>Total other financing sources (uses)</b>	<b>(110,000)</b>	<b>(110,000)</b>	<b>(107,819)</b>	<b>2,181</b>
<b>Net Change in Fund Balance</b>	<b>\$ 81,896</b>	<b>\$ 81,896</b>	<b>691,907</b>	<b>\$ 610,011</b>
<b>Fund Balance, Beginning of Year</b>				
Fund Balance, End of Year			<b>\$ 3,112,232</b>	

**Note 1 - Summary of Significant Accounting Policies**

**A. Organization**

Lake Park-Audubon Public Schools, Lake Park, Minnesota (the District) was formed and operates pursuant to applicable Minnesota laws and statutes. The District is governed by a School Board elected by voters of the District. The financial statements of the District have been prepared in conformity with accounting principles generally accepted in the United States of America as applied to governmental units. The Governmental Accounting Standards Board (GASB) is the accepted standard setting body for establishing governmental accounting and financial reporting principles.

**B. Reporting Entity**

The accompanying financial statements include all funds, departments, agencies, boards, commissions, and other organizations that comprise the District, along with any component units. Component units are legally separate entities for which the District (primary government) is financially accountable, or for which the exclusion of the component unit would render the financial statements of the primary government misleading. The criteria used to determine if the primary government is financially accountable for a component unit include whether or not the primary government appoints the voting majority of the potential component unit's governing body, is able to impose its will on the potential component unit, is in a relationship of financial burden or benefit with the potential component unit, or is fiscally depended upon by the potential component unit.

Based on these criteria, there are no organizations considered to be component units of the District.

Extracurricular student activities are determined primarily by student participants under the guidance of an adult and are generally conducted outside of school hours, in accordance with Minnesota Statutes, the District's School Board controls and is financially accountable with respect to the underlying extracurricular activities. Accordingly, the extracurricular student activity accounts are included in these financial statements.

**C. Government-Wide and Fund Financial Statements**

The government-wide financial statements (Statement of Net Position and Statement of Activities) display information about the reporting government as a whole. These statements include all the financial activities of the District. Generally, the effect of interfund activity has been removed from the government-wide financial statements.

The Statement of Activities demonstrates the degree to which the direct expenses of a given function or segment are offset by program revenues. Direct expenses are those that are clearly identifiable with a specific function or segment. Program revenues include charges to customers or applicants who purchase, use, or directly benefit from goods, services, or privileges provided by a given function or segment and grants and contributions that are restricted to meeting the operational or capital requirements of a particular function or segment. Taxes and other internally directed revenues are reported as general revenues.

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Notes to Financial Statements  
June 30, 2021

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Notes to Financial Statements  
June 30, 2021

The government-wide financial statements are reported using the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of the related cash flows. Property taxes are generally recognized as revenues in the fiscal year for which they are levied, except for amounts advance recognized in accordance with a statutory "tax shift" described later in these notes. Grants and similar items are recognized when all eligibility requirements imposed by the provider have been met.

The District applies restricted resources first when an expense is incurred for which both restricted and unrestricted resources are available. For capital assets that can be specifically identified with, or allocated to functional areas, depreciation expense is included as a direct expense in the functional areas that utilize the related capital assets. Interest on long-term debt is considered an indirect expense and is reported separately on the Statement of Activities.

**D. Fund Financial Statement Presentation**

Separate fund financial statements are provided for governmental. Major individual governmental funds are reported as separate columns in the fund financial statements. Aggregated information for the remaining nonmajor governmental funds is reported in a single column in the fund financial statements.

Governmental fund financial statements are reported using the current financial resources measurement focus and the modified accrual basis of accounting. Under this basis of accounting transactions are recorded in the following manner:

1. *Revenue Recognition* – Revenue is recognized when it becomes measurable and available. "Measurable" means the amount of the transaction can be determined and "available" means collectible within the current period or soon enough thereafter to be used to pay liabilities of the current period. For this purpose, the District generally considers revenues to be available if they are collected within 60 days after year-end. Grants and similar items are recognized when all eligibility requirements imposed by the provider have been met. State revenue is recognized in the year to which it applies according to Minnesota Statutes. Federal revenue is recorded in the year in which the related expenditure is made. Proceeds of long-term debt and acquisitions under capital leases are reported as other financing sources.

2. *Recording of Expenditures* – Expenditures are generally recorded when a liability is incurred, except for principal and interest on long-term debt, severance and healthcare benefits, and compensated absences, which are recognized as expenditures to the extent they have matured. Capital asset acquisitions are included within the applicable functional areas.

**Description of Funds**

The existence of the various district funds has been established by the Minnesota Department of Education. Each fund is accounted for as an independent entity. Descriptions of the funds included in this report are as follows:

**Major Governmental Funds**

*General Fund* – The general fund is used to account for all financial resources except those required to be accounted for in another fund. It includes the general operations and pupil transportation activities of the District, as well as the capital related activities such as maintenance of facilities, equipment purchases, and health and safety projects.

*Debt Service Fund* – The debt service fund is used to account for the accumulation of resources for and the payment of general long-term debt principal and interest.

*Food Service Fund* – The food service fund is used to account for food service revenues and expenditures.

*Community Service Fund* – The community service fund is used to account for services provided to residents in the areas of recreation, civic activities, nonpublic pupils, adult or early childhood programs, extended day programs, or other similar services.

**E. Other Significant Accounting Policies**

**Budgeting**

An operating budget is adopted by July 1 of each fiscal year for all governmental funds on the same modified accrual basis used to reflect actual revenues and expenditures. The superintendent is authorized to transfer budget amounts within line items; however, supplemental appropriations that amend total appropriations of any fund require a board resolution. Reported budgeted amounts are as originally adopted or as amended by board resolution. Unencumbered appropriations lapse at year-end.

**Cash and Cash Equivalents**

Cash and cash equivalents include balances from all funds that are combined and invested to the extent available in various securities as authorized by state law. Earnings from the pooled investments are allocated to the respective funds on the basis of applicable cash balance participation by each fund.

**Receivables**

All receivables are shown net of any allowance for uncollectibles. No allowances for uncollectibles have been recorded. The only receivables not expected to be collected within one year are property taxes receivable.

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Notes to Financial Statements  
June 30, 2021

#### Inventories

Inventories are recorded using the consumption method of accounting and consist of purchased food, supplies, and surplus commodities received from the federal government. Food and supply purchases are recorded at invoice cost, computed on a first-in, first-out method. Surplus commodities are stated at standardized costs, as determined by the U.S. Department of Agriculture.

#### Property Taxes

The majority of district revenue is determined annually by statutory funding formulas. The total revenue allowed by these formulas is allocated between property taxes and state aids by the Legislature based on education funding priorities.

#### Long-Term Obligations

Generally, property taxes are recognized as revenue by the District in the fiscal year that begins midway through the calendar year in which the tax levy is collectible. To help balance the state budget, the Minnesota Legislature utilizes a tool referred to as the "tax shift," which periodically changes the District's recognition of property tax revenue. The tax shift advance recognizes cash collected for the subsequent year's levy as current Year revenue, allowing the state to reduce the amount of aid paid to the District. The remaining portion of the taxes collectible in 2021 is recorded as deferred inflows of resources (property taxes levied for subsequent years).

Property tax levies are certified to the County Auditor in December of each year for collection from taxpayers in May and October of the following calendar year. In Minnesota, counties act as collection agents for all property taxes. The county spreads all levies over taxable property. Such taxes become a lien on property on the following January 1. The county generally remits taxes to the District at periodic intervals as they are collected. A portion of the property taxes levied is paid by the State of Minnesota through various tax credits, which are included in revenue from state sources in the financial statements.

Current property taxes receivable is the uncollected portion of the taxes levied in 2020 and collectible in 2021. This levy is offset with a deferred inflow of resources for property taxes levied for a subsequent year. Delinquent taxes receivable includes the past six years' uncollected taxes. Delinquent taxes have been offset by a deferred inflow of resources for delinquent taxes not received within 60 days after year-end in the fund financial statements.

#### Capital Assets

Capital assets are capitalized at historical cost, or estimated historical cost for assets where actual historic cost is not available. Donated capital assets are recorded at acquisition value at the date of donation. The District maintains a threshold level of \$2,000 or more for capitalizing capital assets. The cost of normal maintenance and repairs that do not add to the value of the asset or materially extend asset lives are not capitalized.

Capital assets are recorded in the government-wide financial statements, but are not reported in the fund financial statements. Capital assets are depreciated using the straight-line method over their estimated useful lives. Since surplus assets are sold for an immaterial amount when declared as no longer needed for public school purposes by the District, no salvage value is taken into consideration for depreciation purposes. Useful lives vary from 3 to 50 years.

Capital assets not being depreciated include land.

The District does not possess any material amounts of infrastructure capital assets. Items such as sidewalks and other land improvements are considered to be part of the cost of buildings or other improvable property.

#### Long-Term Obligations

In the government-wide financial statements, long-term debt and other long-term obligations are reported as liabilities in the applicable governmental activities. Bond premiums and discounts are deferred and amortized over the life of the bonds using the straight-line method.

In the fund financial statements, governmental fund types recognize bond premiums and discounts, as well as bond issuance costs, during the current period. The face amount of debt issued is reported as other financing sources. Premiums received on debt issuances are reported as other financing sources, while discounts on debt issuances are reported as other financing uses. Issuance costs, whether or not withheld from the actual debt proceeds received, are reported as debt service expenditures.

#### Compensated Absences Payable

Vacation – The District compensates substantially all full-time noncertified employees for unused vacation upon termination; however, no employee is allowed to accumulate more than a one-year vacation allowance without District approval. The expenditure for vacation pay is recognized when payment is made. The liability for such leave is reported as incurred in the government-wide financial statements. A liability for those amounts is recorded in the governmental funds only if the liability has matured as a result of employee resignations or retirements.

Sick Pay – Substantially all District employees are allowed to accrue sick leave at varying amounts each year and accumulate within specified limits. Employees are not compensated for unused sick leave upon termination of employment. Since the employees accumulating rights to receive compensation for future absences being caused by future illnesses such amounts cannot be reasonably estimated, a liability for unused sick leave has not been recorded in the financial statements. In some instances, unused sick leave does enter into the calculation of severance pay for some employees upon termination.

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**Pensions**

For purposes of measuring the net pension liability, deferred outflows/inflows of resources, and pension expense, information about the fiduciary net position of the Public Employees Retirement Association (PERA) and the Teachers Retirement Association (TRA) and additions to deductions from PERA's and TRA's fiduciary net position have been determined on the same basis as they are reported by PERA and TRA.

TRA has a special funding situation created by direct aid contributions made by the State of Minnesota, City of Minneapolis and Minneapolis School District. The direct aid is a result of the Minneapolis Teachers Retirement Fund Association merger into TRA in 2006. A second direct aid source is from the State of Minnesota for their merger of the Duluth Teacher's Retirement Fund Association (DTRFA) in 2015. Additional information can be found in Note 8.

For this purpose, plan contributions are recognized as of employer payroll paid dates and benefit payments and refunds are recognized when due and payable in accordance with the benefit terms. Investments are reported at fair value.

**Deferred Outflows of Resources**

In addition to assets, the statement of financial position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element, *deferred outflows of resources*, represents a consumption of net position that applies to a future period(s) and so will not be recognized as an outflow of resources (expense/ expenditure) until then.

The District has two items that qualify for reporting in this category on the government-wide statement of net position. Deferred outflows of resources related to other postemployment benefits consists of various estimate differences and contributions made to the plan subsequent to the measurement date that will be recognized as expenditures in future years. Deferred outflows of resources related to pension plans consists of various estimate differences and contributions made to the plan subsequent to the measurement date that will be recognized as expenses in future years.

**Deferred Inflows of Resources**

In addition to liabilities, the statement of financial position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element, *deferred inflows of resources*, represents an acquisition of net position that applies to a future period(s) and so will not be recognized as an inflow of resources (revenue) until that time.

The District has three types of items that qualify for reporting in this category. The first item, unavailable revenue from property taxes, arises under a modified accrual basis of accounting and is reported only in the Governmental Funds Balance Sheet. Delinquent property taxes not collected within 60 days of year-end are deferred and recognized as an inflow of resources in the governmental funds in the period the amounts become available. The second item is property taxes levied for subsequent years, which represent property taxes received or reported as a receivable before the period for which the taxes are levied, and is reported as a deferred inflow of resources in both the government-wide Statement of Net Position and the Governmental Funds Balance Sheet. Property taxes levied for subsequent years are deferred and recognized as an inflow of resources in the government-wide financial statements in the year for which they are levied and in the governmental fund financial statements during the year for which they are levied, if available. The third item is deferred inflows related to pension and OPEB activity as a result of various estimate differences that will be recognized as expenses in future years, reported in the government-wide statement of net position.

**Net Position**

Net position represents the difference between (a) assets and deferred outflows of resources and (b) liabilities and deferred inflows of resources in the District's government-wide financial statements. Net investment in capital assets consists of capital assets, net of accumulated depreciation, reduced by the outstanding balances of any long-term debt attributable to the acquisition, construction, or improvement of those assets. Restricted net position consists of restricted assets reduced by liabilities and deferred inflows of resources related to those assets. Unrestricted net position is the net amount of assets, deferred outflows of resources, liabilities, and deferred inflows of resources that are not included in the determination of net investment in capital assets or the restricted component of net position.

**Fund Balance**

In governmental fund types, the difference between assets and deferred outflows of resources less liabilities and deferred inflows of resources is called "fund balance." The District's governmental funds report the following categories of fund balance, based on the nature of any limitations requiring the use of resources for specific purposes.

- Nonspendable fund balance amounts are comprised of funds that cannot be spent because they are either not in spendable form or are legally or contractually required to be maintained intact. They include items that are inherently unspendable, such as, but not limited to, inventories, prepaids, long-term receivables, non-financial assets held for resale, or the permanent principal of endowment funds.
- Restricted fund balance amounts are comprised of funds that have legally enforceable constraints placed on their use that either are externally imposed by source providers or creditors (such as through debt covenants), grantors, contributors, voters, or laws or regulations of other governments, or are imposed by law through constitutional provisions or enabling legislation.

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- Committed fund balance amounts are comprised of unrestricted funds used for specific purposes pursuant to constraints imposed by formal action of the school board and that remain binding unless removed by the school board by subsequent formal action. A majority vote of the school board is required to commit a fund balance to a specific purpose and subsequently to remove or change any constraint so adopted by the board. The formal action to commit a fund balance must occur prior to fiscal year end; however, the specific amounts to be committed can be determined in the subsequent fiscal year. A committed fund balance cannot be a negative number.

- Assigned fund balance amounts are comprised of unrestricted funds constrained by the school district's intent that they be used for specific purposes, but that do not meet the criteria to be classified as restricted or committed. In funds other than the general fund, the assigned fund balance represents the remaining amount that is not restricted or committed. The assigned fund balance category will cover the portion of a fund balance that reflects the school district's intended use of those resources. The school board, by majority vote, may assign fund balances to be used for specific purposes when appropriate. The board also delegates the power to assign fund balances to the Finance Committee and the Superintendent and finance manager. The action to assign fund balance may be taken after the end of the fiscal year. An assigned fund balance cannot be a negative number.

- Unassigned fund balance amounts are the residual amounts in the general fund not reported in any other classification. Unassigned amounts in the general fund are technically available for expenditure for any purpose. The general fund is the only fund that can report a positive unassigned fund balance. Other funds would report a negative unassigned fund balance should the total of nonspendable, restricted, and committed fund balances exceed the total net resources of that fund.

The School Board has established a minimum General Fund unassigned fund balance in an amount which shall be no less than 6% of General Fund expenditures for the current fiscal year. If the unassigned fund balance should fall below the established minimum, the Board of Education may request the Superintendent to draft a financial plan to provide for the established minimum fund balance. A reasonable time period will be provided to re-establish the fund balance. The first priority is to utilize the balance as restricted fund balance. Committed funds will be considered second with assigned fund balance third when expenditures are incurred for purposes for which amounts in any of those unrestricted fund balance classification could be used like assigned or unassigned.

**Risk Management**

- The District is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; natural disasters; and workers' compensation for which the District carries commercial insurance. Settled claims have not exceeded this commercial coverage in any of the past three fiscal years. There were no significant reductions in the District's insurance coverage in fiscal year 2021.

**Estimates**

- The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

**Note 2 - Stewardship, Compliance, And Accountability**

**Deficit Fund Balance**

- The Community Service Fund has a \$295,100 deficit balance at June 30, 2021. This deficit fund balance is expected to be eliminated with a subsequent revenue and, if needed, a transfer from the General Fund. The Board intends to transfer the amount of the operating deficit and an additional \$10,000 annually to eliminate the deficit.

**Note 3 - Cash and Cash Equivalents**

**Deposits**

- In accordance with applicable Minnesota Statutes, the District maintains deposits at depository banks authorized by the District's School Board. All such depositories are members of the Federal Reserve System.

The following is considered the most significant risk associated with deposits:

- *Custodial Credit Risk* – In the case of deposits, this is the risk that in the event of a bank failure, the District's deposits may be lost.

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Minnesota Statutes require that all deposits be protected by federal deposit insurance, corporate surety bond, or collateral. The market value of collateral pledged must equal 110% of the deposits not covered by federal deposit insurance or corporate surety bonds. Authorized collateral includes treasury bills, notes, and bonds; issues of U.S. government agencies; general obligations rated "A" or better; revenue obligations rated "AA" or better; irrevocable standard letters of credit issued by the Federal Home Loan Bank; and certificates of deposit. Minnesota Statutes require that securities pledged as collateral be held in safekeeping in a restricted account at the Federal Reserve Bank or in an account at a trust department of a commercial bank or other financial institution that is not owned or controlled by the financial institution furnishing the collateral.

At June 30, 2021, all deposits were insured or collateralized by securities held by the District's agent in the District's name.

The deposits in the Minnesota School District Liquid Asset Fund is not subject to the credit risk classifications as noted in paragraph 9 of GASB Statement No. 40.

The following table presents the District's cash and cash equivalent balances at June 30, 2021:

Minnesota School District Liquid Asset Fund	\$ 4,049,206
Deposits	486,328
Petty cash	3,250
<b>\$ 4,538,784</b>	

**Note 4 - Due from other Governmental Units**

Amounts receivable from other governments as of June 30, 2021, include:

Fund	State	Federal	Total
General	\$ 479,697	\$ 5,485	\$ 485,182
Debt service	13,105	-	13,105
Food service	-	20,285	20,285
Community service	2,905	-	2,905
<b>\$ 495,707</b>	<b>\$ 25,770</b>	<b>\$ 521,477</b>	

Depreciation expense for the year ended June 30, 2021 was charged to the following functions/programs:

Regular instruction	\$ 458,497
Vocational education instruction	403
Instructional support services	646
Pupil support services	103,089
Sites and buildings	50,327
<b>Total depreciation expense</b>	<b>\$ 612,962</b>

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#### **Note 6 - Long-Term Liabilities**

Changes in long-term liabilities during the year ended June 30, 2021 are as follows:

	Balance July 1, 2020	Additions	Deletions	Balance June 30, 2021	Due Within One Year
Bonds payable	\$ 9,910,000	\$ 10,213	\$ 11,891	\$ 1,300,000	\$ 8,610,000
Vacation payable				11,437	10,667
					10,667
	<u>\$ 9,920,213</u>	<u>\$ 11,891</u>	<u>\$ 1,311,437</u>	<u>\$ 8,620,667</u>	<u>\$ 1,310,667</u>

The following is a summary of bonds payable as of June 30, 2021:

Bond Description	Final Maturity	Interest Rate	Original Balance	Outstanding Balance
General Obligation School Building Bonds 2010A	2/1/2027	2.0 - 5.5%	\$ 17,350,000	\$ 7,700,000
General Obligation School Building Refunding Bonds Series 2016A	2/1/2028	2.25%	910,000	910,000

The District receives a Federal subsidy payment in the form of refundable tax credits from the United States Treasury equal to 35% of the stated interest paid. Bond principal payments are made by the debt service fund.

Remaining principal and interest payments on bonds payable are as follows:

Years Ending June 30	Principal	Interest
2022	\$ 1,300,000	\$ 419,275
2023	1,300,000	356,225
2024	1,300,000	291,225
2025	1,300,000	224,600
2026	1,300,000	156,350
2027 - 2028	<u>2,110,000</u>	<u>106,590</u>
	<u><u>\$ 8,610,000</u></u>	<u><u>\$ 1,554,265</u></u>

**Vacation Payable** – Vacation payable for governmental funds is recorded as a liability in the governmental activities in the government-wide statement. This liability matures only upon qualified retirements or terminations and is paid out of the general fund.

#### **Note 7 - Other Postemployment Benefits**

##### **A. Plan Description**

All employees are allowed upon meeting the eligibility requirements under Minn. Stat. 471.61 subd. 2b, to participate in the District's health insurance plan after retirement. This plan covers active and retired employees who have reached age 55 and at least 3 years of service. Benefit provisions are established through negotiations between the District and the union representing District employees and are renegotiated at the end of each contract period. There are also subsidized benefits available to each contract group. A separately issued report is not available.

##### **B. Benefits Provided**

The contract groups have access to other post-employment benefits of blended medical premiums of \$524 for single and \$1,306 for family coverage. The implicit rate subsidy is only until Medicare eligibility. Contract groups receive subsidized other post-employment benefits as follows:

There are no subsidized post-employment dental or life insurance benefits.

##### **C. Employees Covered by Benefit Terms**

At the valuation date of July 1, 2019, the following employees were covered by the benefit terms:

Inactive employees or beneficiaries currently receiving benefit payments	7
Inactive employees entitled to but not yet receiving benefit payments	-

##### **D. Total OPEB Liability**

The District's total OPEB liability of \$774,827 was measured as of July 1, 2020 and was determined by an actuarial valuation as of July 1, 2019.

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**E. Actuarial Assumptions and Other Inputs**

The total OPEB liability in the July 1, 2019 actuarial valuation was determined using the following actuarial assumptions and other inputs, applied to all periods included in the measurement, unless otherwise specified:

Inflation 2.50 percent

Salary increases Service graded table, see sample rates

20-year municipal bond yield 3.10 percent

Discount rate 2.40 percent

Healthcare cost trend rates 6.25 percent in 2020, grading to 5.00 over 5 years

Retiree plan participation Future retirees electing coverage:

Pre-65 subsidy available:

- All administrators

- Teachers

- Support staff

Pre-65 subsidy not available:

- All administrators

- Teachers

- Support staff

Percent of married retirees electing spouse coverage

Percent future retirees electing pre-65 coverage:

Spouse subsidy available 10%

Spouse subsidy not available 10%

Since the plan is not funded by an irrevocable trust, the discount rate is equal to the 20-Year Municipal Bond Yield.

Mortality rates were based on the Pub-2010 Public Retirement Plans Headcount-Weighted Mortality Tables and then projected beyond the valuation date using MP-2018 Generational Improvement Scale.

The actuarial assumptions used in the July 1, 2019 valuation were based on the results of an actuarial experience study as of July 1, 2019.

There were no changes in plan provisions during the measurement period. The following change in actuarial assumption was made during the measurement period:

- The discount rate was changed from 3.10% to 2.40%.

**F. Changes in Total OPEB Liability**

	Balance at July 1, 2020	\$ 728,885
Changes from the Prior Year		
Service cost	61,254	
Interest cost	23,552	
Assumption changes	22,370	
Benefit payments	(61,234)	
<b>Net Change</b>	<b>45,942</b>	
		<b>\$ 774,827</b>

**G. Sensitivity of the Total OPEB Liability to Changes in Discount Rate and the Healthcare Cost Trend Rates**

The following presents the total OPEB liability of the District, as well as what the District's total OPEB liability would be if it were calculated using a discount rate 1 percentage point lower and 1 percentage point higher than the current discount rate:	<table border="1"> <tr> <td style="text-align: center; width: 10%;">1% Decrease in Discount Rate</td><td style="text-align: center;">1.40%</td><td style="text-align: center;">2.40%</td><td style="text-align: center;">3.40%</td></tr> </table>	1% Decrease in Discount Rate	1.40%	2.40%	3.40%		
1% Decrease in Discount Rate	1.40%	2.40%	3.40%				
Total OPEB Liability	\$ 816,600	\$ 774,827	\$ 734,427				
The following presents the total OPEB liability of the District, as well as what the District's total OPEB liability would be if it were calculated using a healthcare cost trend rate 1 percentage point lower and 1 percentage point higher than the current healthcare cost trend rates:							
1% Increase in Healthcare Trend Rate	<table border="1"> <tr> <td style="text-align: center; width: 10%;">1% Decrease in Healthcare Trend Rate</td><td style="text-align: center;">Medical trend rate</td><td style="text-align: center;">Selected Healthcare Trend Rate</td><td style="text-align: center;">1% Increase in Healthcare Trend Rate</td></tr> </table>	1% Decrease in Healthcare Trend Rate	Medical trend rate	Selected Healthcare Trend Rate	1% Increase in Healthcare Trend Rate		
1% Decrease in Healthcare Trend Rate	Medical trend rate	Selected Healthcare Trend Rate	1% Increase in Healthcare Trend Rate				
5.25%, decreasing to 4.00% over 5 years	\$ 700,587	\$ 774,827	\$ 863,185				

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**H. OPEB Expense and Deferred Outflows and Inflows of Resources Related to OPEB**

For the year ended June 30, 2021, the District recognized OPEB expense of \$82,467. At June 30, 2021, the District reported deferred outflows of resources and deferred inflows of resources related to OPEB from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Liability gains	\$ -	\$ 13,529
Assumption changes	19,174	14,136
Employer contributions made after the measurement date	<u>76,570</u>	<u>-</u>
	<u>\$ 95,744</u>	<u>\$ 27,665</u>

The \$76,570 reported as deferred outflows of resources related to OPEB resulting from the District's contributions subsequent to the measurement date will be recognized as a reduction of the total OPEB liability in the year ended June 30, 2022.

Other amounts reported as deferred outflows of resources and deferred inflows of resources related to OPEB will be recognized in OPEB expenses as follows:

Years Ended June 30,	Pension Expense Amount
2022	\$ (2,339)
2023	(2,339)
2024	(2,339)
2025	(2,339)
2026	(2,329)
Thereafter	3,194

**Note 8 - Defined Benefit Pension Plans**

Substantially all employees of the District are required by state law to belong to defined benefit, multi-employer, cost-sharing pension plans administered by the Public Employees' Retirement Association (PERA) or the Teachers' Retirement Association (TRA), all of which are administered on a state-wide basis.

For the year ended June 20, 2021 the District reported its proportionate share of net pension assets, net pension liabilities, deferred outflows of resources, deferred inflows of resources, and pension expense (income) for each of the plans as follows:

	Deferred Outflows of Resources	Net Pension Liability	Deferred Inflows of Resources	Pension Expense (Income)
PERA	\$ 129,600	\$ 1,103,164	\$ 149,505	\$ 78,613
TRA	<u>2,140,514</u>	<u>4,033,921</u>	<u>4,060,649</u>	<u>394,071</u>
Total all plans	<u>\$ 2,270,114</u>	<u>\$ 5,137,085</u>	<u>\$ 4,210,154</u>	<u>\$ 472,684</u>

Disclosures relating to these plans are as follows:

**Public Employees Retirement Association (PERA)**

**A. Plan Descriptions**

The District participates in the General Employees Retirement Plan, a cost-sharing multiple employer defined benefit pension plan administered by the Public Employees Retirement Association of Minnesota (PERA). PERA's defined benefit pension plans are established and administered in accordance with Minnesota Statutes, Chapters 353 and 356. PERA's defined benefit pension plans are tax qualified plans under Section 401 (a) of the Internal Revenue Code.

The General Employees Retirement Plan covers certain full time and part-time employees of the District, other than teachers. General Employees Plan members belong to the Coordinated Plan. Coordinated Plan members are covered by Social Security.

**B. Benefits Provided**

PERA provides retirement, disability, and death benefits. Benefit provisions are established by state statute and can only be modified by the state legislature. Vested, terminated employees who are entitled to benefits, but are not receiving them yet, are bound by the provisions in effect at the time they last terminated their public service.

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General Employees Plan benefits are based on a member's highest average salary for any five successive years of allowable service, age, and years of credit at termination of service. Two methods are used to compute benefits for PERA's Coordinated Plan members. Members hired prior to July 1, 1989, receive the higher of Method 1 or Method 2 formulas. Only Method 2 is used for members hired after June 30, 1989. Under Method 1, the accrual rate for Coordinated members is 1.2 percent for each of the first 10 years of service and 1.7 percent for each additional year. Under Method 2, the accrual rate for Coordinated members is 1.7 percent for all years of service. For members hired prior to July 1, 1989 a full annuity is available when age plus years of service equal 90 and normal retirement age is 65. For members hired on or after July 1, 1989, normal retirement age is the age for unreduced Social Security benefits capped at 66.

Benefit increases are provided to benefit recipients each January. The postretirement increase is equal to 50 percent of the cost-of-living adjustment (COLA) announced by the SSA, with a minimum increase of at least 1 percent and a maximum of 1.5 percent. Recipients that have been receiving the annuity or benefit for at least a full year as of the June 30 before the effective date of the increase will receive the full increase. Recipients receiving the annuity or benefit for at least one month but less than a full year as of the June 30 before the effective date of the increase will receive a reduced prorated increase. For members retiring on January 1, 2024, or later, the increase will be delayed until normal retirement age (age 65 if hired prior to July 1, 1989, or age 66 for individuals hired on or after July 1, 1989). Members retiring under Rule of 90 are exempt from the delay to normal retirement.

**C. Contribution Rate**

*Minnesota Statutes, Chapter 353 sets the rates for employer and employee contributions. Contribution rates can only be modified by the state Legislature.*

Coordinated Plan members were required to contribute 6.50 percent of their annual covered salary in fiscal year 2021 and the District was required to contribute 7.50 percent for Coordinated Plan members. The District's contributions to the General Employees Fund for the year ended June 30, 2021, were \$110,694. The District's contributions were equal to the required contributions as set by state statute.

**D. Pension Costs**

At June 30, 2021, the District reported a liability of \$1,103,164 for its proportionate share of the General Employees Fund's net pension liability. The District's net pension liability reflected a reduction due to the State of Minnesota's contribution of \$16 million. The State of Minnesota is considered a non-employer contributing entity and the state's contribution meets the funding situation. The State of Minnesota's proportionate share of the net pension liability associated with the District totaled \$33,999. The net pension liability was measured as of June 30, 2020, and the total pension liability used to calculate the net pension liability was determined by an actuarial valuation as of that date. The District's proportionate share of the net pension liability was based on the District's contributions received by PERA during the measurement period for employer payroll paid dates from July 1, 2019 through June 30, 2020 relative to the total employer contributions received from all of PERA's participating employers. The District's proportionate share was 0.0184% at the end of the measurement period and 0.0198% for the beginning of the period.

	District's proportionate share of net pension liability	\$ 1,103,164
	State of Minnesota's proportionate share of the net pension liability associated with the District	<u>34,076</u>
	<b>Total</b>	<u><u>\$ 1,137,240</u></u>
		For the year ended June 30, 2021, the District recognized pension expense of \$78,613 for its proportionate share of the General Employees Plan's pension expense. In addition, the District recognized \$2,966 as grant revenue for its proportionate share of the State of Minnesota's pension expense for the annual \$16 million contribution.
		At June 30, 2021, the District reported its proportionate share of the General Employees Plan's deferred outflows of resources and deferred inflows of resources related to pensions from the following sources:
	Deferred Outflows of Resources	Deferred Inflows of Resources
	<u><u>\$ 10,821</u></u>	<u><u>\$ 4,174</u></u>
	Differences between expected and actual economic experience	- 42,592
	Changes in actuarial assumptions	-
	Net collective difference between projected and actual investment earnings	5,311 -
	Changes in proportion	2,774 102,739
	Contributions paid to PERA subsequent to the measurement date	<u><u>\$ 110,694</u></u>
	<b>Total</b>	<u><u>\$ 129,600</u></u>
		The \$110,694 reported as deferred outflows of resources related to pensions resulting from District contributions subsequent to the measurement date will be recognized as a reduction of the net pension liability in the year ended June 30, 2022. Other amounts reported as deferred outflows and deferred inflows of resources related to pensions will be recognized in pension expense as follows:
	Pension Expense Amount	
	<u><u>Years Ended June 30,</u></u>	
	2022	\$ (138,571)
	2023	(20,429)
	2024	1,748
	2025	26,653

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**E. Actuarial Assumptions**

The total pension liability in the June 30, 2020, actuarial valuation was determined using an individual entry-age normal actuarial cost method and the following actuarial assumptions:

Inflation	2.25% per year
Active Member Payroll Growth	3.00% per year
Investment Rate of Return	7.50% per year

Salary increases were based on a service-related table. Mortality rates for active members, retirees, survivors, and disabilitants were based on Pub-2010 General Employee Mortality table for the General Employees Plan for males or females, as appropriate, with slight adjustments to fit PERA's experience. Cost of living benefit increases after retirement for retirees are assumed to be 1.25 percent per year for the General Employees Plan.

Actuarial assumptions used in the June 30, 2020 valuation were based on the results of actuarial experience studies. The most recent four-year experience study for the General Employees plan was completed in 2019. The assumption changes were adopted by the Board and became effective with the July 1, 2020 actuarial valuation.

The following changes in actuarial assumptions and plan provisions occurred in 2020:

Changes in Actuarial Assumptions:

- The price inflation assumption was decreased from 2.50% to 2.25%.
- The payroll growth assumption was decreased from 3.25% to 3.00%.
- Assumed salary increase rates were changed as recommended in the June 30, 2019 experience study. The net effect is assumed rates that average 0.25% less than previous rates.
- Assumed rates of retirement were changed as recommended in the June 30, 2019 experience study. The changes result in more unreduced (normal) retirements and slightly fewer Rule of 90 and early retirements.
- Assumed rates of termination were changed as recommended in the June 30, 2019 experience study. The new rates are based on service and are generally lower than the previous rates for years 2-5 and slightly higher thereafter.
- Assumed rates of disability were changed as recommended in the June 30, 2019 experience study. The change results in fewer predicted disability retirements for males and females.
- The base mortality table for healthy annuitants and employees was changed from the RP-2014 table to the Pub-2010 General Mortality table, with adjustments. The base mortality table for disabled annuitants was changed from the RP-2014 disabled annuitant mortality table to the PUB-2010 General/Teacher disabled annuitant mortality table, with adjustments.
- The mortality improvement scale was changed from Scale MP-2018 to Scale MP-2019.
- The assumed spouse age difference was changed from two years older for females to one year older.
- The assumed number of married male new retirees electing the 100% Joint & Survivor option changed from 35% to 45%. The assumed number of married female new retirees electing the 100% Joint & Survivor option changed from 15% to 30%. The corresponding number of married new retirees electing the Life annuity option was adjusted accordingly.

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**Changes in Plan Provisions:**

- Augmentation for current privatized members was reduced to 2.0% for the period July 1, 2020 through December 31, 2023 and 0.0% after. Augmentation was eliminated for privatizations occurring after June 30, 2020.

The State Board of Investment, which manages the investments of PERA, prepares an analysis of the reasonableness on a regular basis of the long-term expected rate of return using a building-block method in which best estimate ranges of expected future rates of return are developed for each major asset class. These ranges are combined to produce an expected long-term rate of return by weighting the expected future rates of return by the target asset allocation percentages. The target allocation and best estimates of geometric real rates of return for each major asset class are summarized in the following table:

Asset Class	Target Allocations	Long-Term Expected Real Rate of Return	
		5.10%	5.30%
Domestic Stocks	35.5%	17.5%	0.75%
International Stocks	20.0%	25.0%	5.90%
Bonds (Fixed Income)	25.0%	2.0%	0.00%
Alternative Assets (Private Markets)			
Cash			
Total		100%	

**E. Discount Rate**

The discount rate used to measure the total pension liability in 2020 was 7.50%. The projection of cash flows used to determine the discount rate assumed that contributions from plan members and employers will be made at rates set in Minnesota Statutes. Based on these assumptions, the fiduciary net position of the General Employees Fund was projected to be available to make all projected future benefit payments of current plan members. Therefore, the long-term expected rate of return on pension plan investments was applied to all periods of projected benefit payments to determine the total pension liability.

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**G. Pension Liability Sensitivity**

The following presents the District's proportionate share of the net pension liability for the plan it participates in, calculated using the discount rate disclosed in the preceding paragraph, as well as what the District's proportionate share of the net pension liability would be if it were calculated using a discount rate one percentage point lower or one percentage point higher than the current discount rate:

Sensitivity Analysis		Net Pension Liability (Asset) at Different Discount Rates	
		General Employees Fund	
1% Lower		6.50%	\$ 1,767,989
Current Discount Rate		7.50%	\$ 1,103,164
1% Higher		8.50%	\$ 554,737

**H. Pension Plan Fiduciary Net Position**

Detailed information about the pension plan's fiduciary net position is available in a separately-issued PERA financial report that includes financial statements and required supplementary information. That report may be obtained on the Internet at [www.mnpera.org](http://www.mnpera.org).

**Teacher Retirement Association (TRA)**

**A. Plan Description**

The Teachers Retirement Association (TRA) is an administrator of a multiple employer, cost-sharing, defined benefit retirement fund. TRA administers a Basic Plan (without Social Security coverage) and a Coordinated Plan (with Social Security coverage) in accordance with Minnesota Statutes, Chapters 354 and 356. TRA is a separate statutory entity and administered by a Board of Trustees. The Board consists of four active members, one retired member and three statutory officials.

Educators employed in Minnesota's public elementary and secondary schools, charter schools, and certain other TRA-covered educational institutions maintained by the state are required to be TRA members (except those employed by St. Paul schools or Minnesota State Colleges and Universities). Educators first hired by Minnesota State may elect either TRA coverage or coverage through the Defined Contribution Plan (DCR) administered by Minnesota State.

**B. Benefits Provided**

TRA provides retirement benefits as well as disability benefits to members, and benefits to survivors upon death of eligible members. Benefits are established by Minnesota Statute and vest after three years of service credit. The defined retirement benefits are based on a member's highest average salary for any five consecutive years of allowable service, age, and a formula multiplier based on years of credit at termination of service.

Two methods are used to compute benefits for TRA's Coordinated and Basic Plan members. Members first employed before July 1, 1989, receive the greater of the Tier I or Tier II benefits as described.

Tier I Benefits	Step Rate Formula	Percentage
Basic	First ten years of service All years after	2.2% per year 2.7% per year
Coordinated	First ten years if service years are up to July 1, 2006 First ten years if service years are July 1, 2006 or after All other years of service if service years are up to July 1, 2006 All other years of service if service years are July 1, 2006 or after	1.2% per year 1.4% per year 1.7% per year 1.9% per year

With these provisions:

1. Normal retirement age is 65 with less than 30 years of allowable service and age 62 with 30 or more years of allowable service.
2. 3 percent per year early retirement reduction factor for all years under normal retirement age.
3. Unreduced benefits for early retirement under a Rule-of-90 (age plus allowable service equals 90 or more).

or

*Tier II Benefits*

For years of service prior to July 1, 2006, a level formula of 1.7 percent per year for coordinated members and 2.7 percent per year for basic members is applied. For years of service July 1, 2006 and after, a level formula of 1.9 percent per year for coordinated members and 2.7 percent per year for basic members applies. Beginning July 1, 2015, the early retirement reduction factors are based on rates established under Minnesota Statute. Smaller reductions, more favorable to the member, will be applied to individuals who reach age 62 and have 30 years or more of service credit.

Members first employed after June 30, 1989, receive only the Tier II benefit calculation with a normal retirement age that is their retirement age for full Social Security retirement benefits, but not to exceed age 66.

Six different types of annuities are available to members upon retirement. The No Refund Life plan is a lifetime annuity that ceases upon the death of the retiree – no survivor annuity is payable. A retiring member may also choose to provide survivor benefits to a designated beneficiary(ies) by selecting one of the five plans that have survivorship features. Vested members may also leave their contributions in the TRA Fund upon termination of service in order to qualify for a deferred annuity at retirement age. Any member terminating service is eligible for a refund of their employee contributions plus interest.

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The benefit provisions stated apply to active plan participants. Vested, terminated employees who are entitled to benefits but not yet receiving them are bound by the plan provisions in effect at the time they last terminated their public service.

**C. Contribution Rate**

Per Minnesota Statutes, Chapter 354 sets the contribution rates for employees and employers. Rates for each fiscal year ending June 30, 2019, June 30, 2020, and June 30, 2021 were:

	June 30, 2019	June 30, 2020	June 30, 2021	
Employees	Employers	Employees	Employees	Employers
Basic Coordinated	11.00% 7.50%	11.71% 7.71%	11.00% 7.50%	11.93% 7.92%
				12.13% 8.33%
The following is a reconciliation of employer contributions in TRA's fiscal year 2020 Comprehensive Annual Financial Report "Statement of Changes in Fiduciary Net Position" to the employer contributions used in Schedule of Employer and Non-Employer Pension Allocations.				
Employer contributions reported in TRA's Comprehensive Annual Financial Report, Statement of Changes in Fiduciary Net Position				
		\$ 425,223,000		
Add employer contributions not related to future contribution efforts		(56,000)		
Deduct TRA's contributions not included in allocation		(508,000)		
Total employer contributions		424,659,000		
Total non-employer contributions		35,587,000		
Total contributions reported in <i>Schedule of Employer and Non-Employer Allocations</i>				
		\$ 460,246,000		
Amounts reported in the allocation schedules may not precisely agree with financial statement amounts or actuarial valuations due to the number of decimal places used in the allocations. TRA has rounded percentage amounts to the nearest ten thousands.				

**D. Actuarial Assumptions**

The total pension liability in the June 30, 2020, actuarial valuation was determined using the following actuarial assumptions, applied to all periods included in the measurement:

**Key Methods and Assumptions Used in Valuation of Total Pension Liability**

**Actuarial Information**

	Valuation Date		
	July 1, 2020		
Employees	June 5, 2015	Experience Study	June 5, 2015 November 6, 2017 (economic assumptions)
Employers	Entry Age Normal	Actuarial Cost Method	Entry Age Normal
		Investment rate of return	7.50%
		Price inflation	2.50%
		Wage growth rate	2.85% before July 1, 2028, and 3.25% after June 30, 2028
		Projected salary increase	2.85% to 8.85% before July 1, 2028, and 3.25% to 9.25% after June 30, 2028
		Cost of living adjustment	1.0% for January 2020 through January 2023, then increasing by 0.1% each year up to 1.5% annually
<b>Mortality assumptions</b>			
	Pre-retirement		RP-2014 white collar employee table, male rates set back six years and female rates set back five years. Generational projection uses the MP-2015 scale.
	Post-retirement		RP-2014 white collar annuitant table, male rates set back three years and female rates set back three years, with further adjustments of the rates. Generational projection uses the MP-2015 scale.
	Post-disability		RP-2014 disabled retiree mortality table, without adjustment.

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

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The target allocation and best estimates of geometric real rates of return for each major asset class are summarized in the following table:

Asset Class	Target Allocations	Long-Term Expected Real Rate of Return
Domestic Equity	35.5%	5.10%
International Equity	17.5%	5.30%
Private Markets	25.0%	5.90%
Fixed Income	20.0%	0.75%
Unallocated Cash	2.0%	0.00%
Total		100%

The TRA actuary has determined the average of the expected remaining service lives of all members for fiscal year 2016 is six years. The *Difference between Expected and Actual Experience, Changes of Assumptions, and Changes in Proportion* use the amortization period of six years in the schedule presented. The amortization period for *Net Difference between Projected and Actual Investment Earnings on Pension Plan Investments* is five years as required by GASB 68.

**Changes in actuarial assumptions since the 2018 valuation**

- The COLA was reduced from 2.0% each January 1 to 1.0%, effective January 1, 2019. Beginning January 1, 2024, the COLA will increase 0.1% each year until reaching the ultimate rate of 1.5% in January 1, 2028.
- Beginning July 1, 2024, eligibility for the first COLA changes to normal retirement age (age 65 to 66, depending on date of birth). However, members who retire under Rule of 90 and members who are at least age 62 with 30 years of service credit are exempt.
- The COLA trigger provision, which would have increased the COLA to 2.5% if the funded ratio was at least 90% for two consecutive years, was eliminated.
- Augmentation in the early retirement reduction factors is phased out over a five-year period beginning July 1, 2019 and ending June 30, 2024 (this reduces early retirement benefits). Members who retire and are at least age 62 with 30 years of service are exempt.
- Augmentation on deferred benefits will be reduced to zero percent beginning July 1, 2019. Interest payable on refunds to members was reduced from 4.0% to 3.0%, effective July 1, 2018. Interest due on payments and purchases from members, employers is reduced from 8.5% to 7.5%, effective July 1, 2018.
- The employer contribution rate is increased each July 1 over the next 6 years, (7.71% in 2018, 7.92% in 2019, 8.13% in 2020, 8.34% in 2021, 8.55% in 2022, and 8.75% in 2023). In addition, the employee contribution rate will increase from 7.50% to 7.75% on July 1, 2023. The state provides funding for the higher employer contribution rate through an adjustment in the school aid formula.

**E. Discount Rate**

The discount rate used to measure the total pension liability was 7.50%. There was no change since the prior measurement date. The projection of cash flows used to determine the discount rate assumed that employee contributions will be made at the fiscal year 2020 contribution rate, contributions from school districts will be made at contractually required rates (actuarially determined), and contributions from the state will be made at current statutorily required rates. Based on those assumptions, the pension plan's fiduciary net position was not projected to be depleted and, as a result, the Municipal Bond Index Rate was not used in the determination of the Single Equivalent Interest Rate (SEIR).

**F. Net Pension Liability**

At June 30, 2021, the District reported a liability of \$4,033,921 for its proportionate share of the net pension liability. The net pension liability was measured as of June 30, 2020, and the total pension liability used to calculate the net pension liability was determined by an actuarial valuation as of that date. The District's proportion of the net pension liability was based on the District's contributions to TRA in relation to total system contributions including direct aid from the State of Minnesota, City of Minneapolis and Minneapolis School District. District proportionate share was 0.0546% at the end of the measurement period and 0.0551% for the beginning of the year.

The pension liability amount reflected a reduction due to direct aid provided to TRA. The amount recognized by the District as its proportionate share of the net pension liability, the direct aid, and total portion of the net pension liability that was associated with the District were as follows:

District's proportionate share of net pension liability	<u>\$ 4,033,921</u>
State's proportionate share of the net pension liability associated with the district	<u>\$ 338,193</u>

For the year ended June 30, 2021, the District recognized pension expense of \$394,071. It also recognized \$30,981 as an increase to pension expense for the support provided by direct aid.

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At June 30, 2021, the District reported its proportionate share of the TRA's deferred outflows of resources and deferred inflows of resources, and its contributions subsequent to the measurement date, related to pensions from the following sources:

	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual economic experience	\$ 80,896	\$ 63,622
Changes in actuarial assumptions	1,701,324	3,584,519
Difference between projected and actual investment earnings	45,685	-
Change in proportion and differences between contributions made and District's proportionate share of contributions	36,177	412,508
District's contributions to TRA subsequent to the measurement date	<u>276,432</u>	<u>-</u>
Total	<u>\$ 2,140,514</u>	<u>\$ 4,060,649</u>

The \$276,432 reported as deferred outflows of resources related to pensions resulting from District contributions to TRA subsequent to the measurement date will be recognized as a reduction of the net pension liability in the year ended June 30, 2022.

Other amounts reported as deferred outflows and inflows of resources related to TRA pensions will be recognized in pension expense as follows:

	Pension Expense Amount
Years Ended June 30,	
2022	\$ 136,137
2023	(1,442,378)
2024	(940,051)
2025	41,395
2026	8,330

**G. Pension Liability Sensitivity**

The following presents the District's proportionate share of the net pension liability calculated using the discount rate of 7.50% as well what the net pension liability would be if it were calculated using a discount rate that is one percentage point lower (6.50%) or one percentage point higher (8.50%) than the current rate.

	1% Decrease in Discount Rate	1% Increase in Discount Rate
TRA discount rate	6.50%	7.50%
District's proportionate share of the TRA net pension liability	\$ 6,175,891	\$ 4,033,921

The District's proportion of the net pension liability was based on the employer contributions to TRA in relation to TRA's total employer contributions including direct aid contributions from the State of Minnesota, City of Minneapolis and Minneapolis School District.

**H. Pension Plan Fiduciary Net Position**

Detailed information about TRA's fiduciary net position is available in a separately issued TRA financial report. That report can be obtained at [www.MinnesotaTRA.org](http://www.MinnesotaTRA.org), by writing to TRA at 60 Empire Drive, Suite 400, and St. Paul, MN, 55103-4000; or by calling (651)-296-2409 or (800)-657-3669.

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**Note 9 - Fund Balance and Net Position**

Certain portions of fund balances and net position are restricted based on state requirements to track special program funding, to provide for funding on certain long-term liabilities, or as required by other outside parties.

At June 30, 2021, the District has recorded the following fund balances for the following purposes:

	General Fund	Debt Service Fund	Food Service	Community Service	Total
Fund balances					
Nonspendable Inventories	\$ -	\$ -	\$ 1,111	\$ -	\$ 1,111
Restricted					
Student activities	225,240				225,240
Operating capital	31,689				31,689
Disabled accessibility	34,772				34,772
Safe schools	6,664				6,664
Gifted and talented	146,772				146,772
Long term facilities maintenance	144,841				144,841
Medical assistance	108,191				108,191
Debt service	43,966				43,966
Food service	25,112				25,112
Community service	218,364				218,364
Community education	14,930				14,930
Early childhood family education	(71,666)				(71,666)
School readiness	(125,948)				(125,948)
Total restricted	(112,416)				(112,416)
Unassigned					
Total fund balance	\$ 3,112,232	\$ 25,112	\$ 219,475	\$ (295,100)	\$ 3,063,719

The UFARS fund balance reporting standards are slightly different than the reporting standards under GASB 54. *Fund Balance Reporting and Governmental Fund Type Definitions*. Below is a reconciliation between the fund balance reporting under GASB 54 and UFARS reporting standards:

	GASB Balance	Reconciling Items	UFARS Balance
Fund balances			
Nonspendable Inventories	\$ 1,111	\$ -	\$ 1,111
Restricted			
Student activities	225,240	-	225,240
Operating capital	146,772	-	146,772
Disabled accessibility	6,664	-	6,664
Safe schools	144,841	-	144,841
Gifted and talented	16,236	-	16,236
Long term facilities maintenance	108,191	-	108,191
Medical assistance	43,966	-	43,966
Debt service	25,112	-	25,112
Food service	218,364	-	218,364
Community service	14,930	-	14,930
Community education	(71,666)	(71,666)	(71,666)
Early childhood family education	(125,948)	(125,948)	(125,948)
School readiness	(112,416)	(112,416)	(112,416)
Total restricted	950,316	(310,030)	640,286
Unassigned	2,388,633	2,078,603	3,310,030
Total fund balance	\$ 3,112,232	\$ 3,063,719	\$ 3,030,030

**Note 10 - Interfund Receivables, Payables, and Transfer**

The interfund receivable/payable between the Community Service Fund and the General Fund was used to prevent a cash deficit in the Community Service Fund. At June 30, 2021, the Community Service Fund owed the General Fund \$207,933.

The transfer of \$110,000 from the General Fund to the Community Service Fund was used to fund the 2021 Community Service operating deficit and reduce the deficit fund balance.

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**Note 11 - Flexible Benefit Plan**

The District has a flexible benefit plan which is classified as a "cafeteria plan" (the plan) under section 125 of the Internal Revenue Code. All employee groups of the District are eligible if and when the collective bargaining agreement or contract with their group allows eligibility. Eligible employees can elect to participate by contributing pre-tax dollars withheld from payroll checks to the plan for healthcare and dependent care benefits.

Before the beginning of the plan year, which is from September 1 to August 31, each participant designates a total amount of pre-tax dollars to be contributed to the plan during the year. At August 31, the District is contingently liable for claims against the total amount of participants' annual contributions to the medical reimbursement portion of the plan, whether or not such contributions have been made.

Payment of insurance premiums (health, dental, life, and disability) are made by the District directly to the designated insurance companies. These payments are made on a monthly basis and are accounted for in the General Fund and Special Revenue funds.

Amounts withheld for medical reimbursement and dependent care are paid by the District to an outside administrator upon an employee submitting a request for reimbursement. Payments are made by the outside administrator to participating employees upon submitting a request for reimbursement of eligible expenses actually incurred by the employee.

All property of the plan and income attributable to that property is solely the property of the District, subject to the claims of the District's general creditors. Participants' rights under the plan are equal to those of general creditors of the District in an amount equal to eligible healthcare and dependent care expenses incurred by the participants. The District believes that it is unlikely that it will use the assets to satisfy the claims of general creditors in the future.

**Note 12 - Employee Benefit Plan 403(b)**

District employees are eligible to participate in the 403(b) when they are full-time employees. The District will match the employees' deferral up to a maximum of \$750 per year for all employees. The maximum career matching contribution by the District will not exceed \$20,000. The District contributed \$48,294 to the plan in 2021.

**Note 13 - Commitments and Contingencies**

**Federal and State Revenue**

Amounts received or receivable from federal and state agencies are subject to agency audit and adjustment. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable funds. The amount, if any, of funds which may be disallowed by the agencies cannot be determined at this time although the District expects such amounts, if any, to be immaterial.

**Operating Leases**

The District is obligated under certain leases accounted for as operating leases. These leases are generally cancelable on an annual basis by the District. Operating leases do not give rise to property rights or lease obligations and, therefore, the results of the lease agreements are not reflected as a liability in the District's financial statements. As of June 30, 2021, the District had operating leases for copy machines and laptop computers. The lease terms range from 48 to 60 months. Lease expense for the year ended June 30, 2021 was \$100,274. Future minimum lease payments for the terms of the lease are as follows:

Years Ending June 30,			
2022	\$ 100,103		
2023	46,783		
2024	3,899		
	<u>\$ 150,785</u>		

**Note 14 - Related Organization**

The District, in conjunction with five other school districts, is a member district of Lake Agassiz Education Cooperative, Joint Power District No. 397. The Cooperative is governed by a Governing Board appointed by the District they represent. The purpose of the Joint Powers Board is to provide by cooperative effort a comprehensive special education program for the member districts. Contributions of \$150,730 were made by the District to the related organization for the year ended June 30, 2021. The contributions are based on the operating budget of the Cooperative and allocated per agreement to the member districts.

Lake Agassiz Education Cooperative is separately audited from the District. Complete financial statements for the Cooperative can be obtained from its administrative office at PO Box 628, Hawley, Minnesota 56549.

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 Schedule of Changes in the District's Total OPEB Liability and Related Ratios  
 June 30, 2021

**Schedule of Changes in the District's Total OPEB Liability and Related Ratios, Last 10 Fiscal Years\***

	2021	2020	2019	2018
Service cost	\$ 61,254	\$ 53,750	\$ 60,826	\$ 59,054
Interest	23,352	25,981	24,787	23,851
Assumption changes	22,370	(19,792)	-	-
Differences between expected and actual experience	-	-	-	-
Benefit payments	(61,234)	(18,943)	(42,246)	(71,817)
Net change in total OPEB liability	45,942	(3,633)	43,367	11,088
Total OPEB liability - beginning	728,885	732,118	689,151	678,063
Total OPEB liability - ending	\$ 774,827	\$ 728,885	\$ 732,518	\$ 689,151
Covered payroll	\$ 4,156,284	\$ 4,035,227	\$ 4,310,916	\$ 4,185,355
District's total OPEB liability as a percentage of covered payroll	18.64%	18.06%	16.99%	16.47%

\*GASB Statement No. 75 require ten years of information to be presented in this table. However, until a full 10-year trend is compiled, the District will present information for those years for which information is available.

**Notes to the Schedule of Changes in the District's Total OPEB Liability and Related Ratios**

**Fiscal Year 2020 Changes**

Plan Provisions:

- There were no changes in plan provisions.

Plan Assumptions:

- The discount rate was changed from 3.10% to 2.40%.

**Fiscal Year 2020 Changes**

Plan Provisions:

- The new Superintendent does not have a subsidy. Since she is over the Medicare eligibility age, this change has no impact on the liability.

Plan Assumptions:

- The health care trend rates were changed to better anticipate short term and long term medical increases.
  - The mortality tables were updated from the RP-2014 White Collar Mortality Tables with MP-2016 Generational Improvement Scale to the Pdu-2010 Public Retirement Plans Headcount-Weighted Mortality Tables (General, Teachers) with MP-2018 Generational Improvement Scale.
  - The salary increase rates were changed from a flat 3.00% per year for all employees to rates which vary by service and contract group.
  - The discount rate was changed from 3.40% to 3.10%.

Required Supplementary Information  
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Independent School District No. 2889  
**Lake Park - Audubon Area Public Schools**  
 Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions  
 Last 10 Fiscal Years \*  
 June 30, 2021

**Schedule of Employer's Share of Net Pension Liability**  
**Last 10 Fiscal Years \***

Pension Plan	Measurement Date	Employer's Proportion of the Net Pension Liability Asset(s) [a]	Employee's Proportionate Share (Amount of the Net Pension Liability)	Employee's Proportionate Share of the Net Pension Liability	Total (d)	Employee's Covered Payroll [e]	Plan Fiduciary Net Position as a Percentage of the Total Pension Liability
					[e+b]		
PERA	6/30/2020	0.084%	\$ 1,031,64	\$ 34,076	\$ 1,137,740	\$ 123,573	89.5%
PERA	6/30/2019	0.039%	\$ 1,094,638	\$ 33,999	\$ 1,128,697	\$ 129,707	84.7%
PERA	6/30/2018	0.019%	\$ 1,093,875	\$ 35,767	\$ 1,128,642	\$ 124,667	88.1%
PERA	6/30/2017	0.022%	\$ 1,438,835	\$ 18,100	\$ 1,454,935	\$ 138,320	103.7%
PERA	6/30/2016	0.015%	\$ 1,435,15	\$ 12,240	\$ 1,452,616	\$ 118,253	140.6%
PERA	6/30/2015	0.020%	\$ 1,467,559	\$ 10,610	\$ 1,487,609	\$ 111,882	132.6%
PERA	6/30/2014	0.039%	\$ 1,925,407	N/A	\$ 925,407	\$ 105,3187	87.7%
TRA	6/30/2020	0.054%	\$ 4,033,921	\$ 338,193	\$ 4,372,114	\$ 317,851	127.1%
TRA	6/30/2019	0.055%	\$ 3,512,036	\$ 310,931	\$ 3,823,018	\$ 313,350	78.1%
TRA	6/30/2018	0.057%	\$ 3,620,320	\$ 312,620	\$ 3,932,640	\$ 313,879	112.2%
TRA	6/30/2017	0.058%	\$ 1,120,240	\$ 117,200	\$ 1,275,250	\$ 121,549	31.1%
TRA	6/30/2016	0.064%	\$ 1,513,232	\$ 16,849,233	\$ 1,586,091	\$ 331,533	458.5%
TRA	6/30/2015	0.060%	\$ 3,742,523	\$ 458,915	\$ 4,201,438	\$ 312,787	44.9%
TRA	6/30/2014	0.064%	\$ 2,976,721	\$ 208,274	\$ 3,185,955	\$ 296,262	78.8%

\* GASB Statement No. 68 requires ten years of information to be presented in this table. However, until a full 10-year trend is compiled, the District will present information for those years for which information is available.

**Schedule of Employer's Contributions**  
**Last 10 Fiscal Years \***

Pension Plan	Fiscal Year Ending	Statutorily Required Contribution [a]	Contribution Relation to the Statutorily Required Contribution [b]	Contribution Deficiency (Excess) [a-b]	Covered Payroll [d]	Contributions as a Percentage of Covered Payroll [b/d]
PERA	6/30/2020	\$ 110,694	\$ 110,694	\$ -	\$ 1,475,920	7.5%
PERA	6/30/2019	\$ 92,443	\$ 92,443	\$ -	\$ 1,223,573	7.5%
PERA	6/30/2018	\$ 96,878	\$ 96,878	\$ -	\$ 1,291,707	7.5%
PERA	6/30/2017	\$ 93,065	\$ 93,065	\$ -	\$ 1,240,867	7.5%
PERA	6/30/2016	\$ 103,899	\$ 91,369	\$ -12,530	\$ 1,385,320	7.5%
PERA	6/30/2015	\$ 89,129	\$ 89,129	\$ -	\$ 1,218,253	7.5%
TRA	6/30/2021	\$ 276,432	\$ 276,432	\$ -	\$ 1,188,387	7.5%
TRA	6/30/2020	\$ 251,369	\$ 251,369	\$ -	\$ 3,400,148	8.1%
TRA	6/30/2019	\$ 241,350	\$ 241,350	\$ -	\$ 3,173,481	7.9%
TRA	6/30/2018	\$ 239,204	\$ 239,204	\$ -	\$ 3,130,350	7.7%
TRA	6/30/2017	\$ 234,412	\$ 234,412	\$ -	\$ 3,189,387	7.5%
TRA	6/30/2016	\$ 250,465	\$ 250,465	\$ -	\$ 3,125,493	7.5%
TRA	6/30/2015	\$ 224,509	\$ 224,509	\$ -	\$ 3,339,533	7.5%

\* GASB Statement No. 68 requires ten years of information to be presented in this table. However, until a full 10-year trend is compiled, the District will present information for those years for which information is available.

**Notes to the Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions**

- PFRA**
- 2020 Changes**
- Changes in Actuarial Assumptions
- The price inflation assumption was decreased from 2.50% to 2.25%.
  - The payroll growth assumption was decreased from 3.25% to 3.00%.
  - Assumed salary increase rates were changed as recommended in the June 30, 2019 experience study. The net effect is assumed rates that average 0.25% less than previous rates.
  - Assumed rates of retirement were changed as recommended in the June 30, 2019 experience study. The changes result in more unreduced (normal) retirements and slightly fewer Rule of 90 and early retirements.
  - Assumed rates of termination were changed as recommended in the June 30, 2019 experience study. The new rates are based on service and are generally lower than the previous rates for years 2-5 and slightly higher thereafter.
  - Assumed rates of disability were changed as recommended in the June 30, 2019 experience study. The change results in fewer predicted disability retirements for males and females.
  - The base mortality table for healthy annuitants and employees was changed from the RP-2014 table to the PUB-2010 General Mortality table, with adjustments. The base mortality table for disabled annuitants was changed from the RP-2014 disabled annuitant mortality table to the PUB-2010 General/Teacher disabled annuitant mortality table, with adjustments.
  - The mortality improvement scale was changed from Scale MP-2018 to Scale MP-2019.
  - The assumed spouse age difference was changed from two years older to one year older.
  - The assumed number of married male new retirees electing the 100% joint & Survivor option changed from 35% to 45%. The assumed number of married female new retirees electing the 100% joint & Survivor option was adjusted accordingly.
- Changes in Plan Provisions
- Augmentation for current privatized members was reduced to 2.0% for the period July 1, 2020 through December 31, 2023 and 0.0% after. Augmentation was eliminated for privatizations occurring after June 30, 2020.
- 2019 Changes**
- Changes in Actuarial Assumptions
- The mortality projection scale was changed from MP-2017 to MP-2018.
  - Changes in Plan Provisions
  - The employer supplemental contribution was changed prospectively, decreasing from \$31.0 million to \$21.0 million per year. The State's special funding contribution was changed prospectively, requiring \$16.0 million due per year through 2031.

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions  
June 30, 2021

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions  
June 30, 2021

**2018 Changes**

Changes in Actuarial Assumptions

- The mortality projection scale was changed from MP-2015 to MP-2017.
- The assumed benefit increase was changed from 1.00 percent per year through 2044 and 2.50 percent per year thereafter to 1.25 percent per year.
- The augmentation adjustment in early retirement factors is eliminated over a five-year period starting July 1, 2019, resulting in actuarial equivalence after June 30, 2024.
- Interest credited on member contributions decreased from 4.00 percent to 3.00 percent, beginning July 1, 2018.
- Deferred augmentation was changed to 0.00 percent, effective January 1, 2019. Augmentation that has already accrued for deferred members will still apply.
- Contribution stabilizer provisions were repealed.

- Postretirement benefit increases were changed from 1.00 percent per year with a provision to increase to 2.50 percent upon attainment of 90.00 percent funding ratio to 50.00 percent of the Social Security Cost of Living Adjustment, not less than 1.00 percent and not more than 1.50 percent, beginning January 1, 2019.
- For retirements on or after January 1, 2024, the first benefit increase is delayed until the retiree reaches normal retirement age; does not apply to Rule of 90 retirees, disability benefit recipients, or survivors.
- Actuarial equivalent factors were updated to reflect revised mortality and interest assumptions.

**2017 Changes**

Changes in Actuarial Assumptions

- The combined service annuity (CSA) loads were changed from 0.80 percent for active members and 60.00 percent for vested and non-vested deferred members. The revised CSA loads are now 0.00 percent for active member liability, 15.00 percent for vested deferred member liability, and 3.00 percent for non-vested deferred member liability.
- The assumed postretirement benefit increase rate was changed for 1.00 percent per year for all years to 1.00 percent per year through 2044 and 2.50 percent per year thereafter.
- The State's contribution for the Minneapolis Employees Retirement Fund equals \$16,000,000 in 2017 and 2018, and \$6,000,000 thereafter.
- The Employer Supplemental Contribution for the Minneapolis Employees Retirement Fund changed from \$21,000,000 to \$31,000,000 in calendar years 2019 to 2031. The state's contribution changed from \$16,000,000 to \$6,000,000 in calendar years 2019 to 2031.

**2016 Changes:**

Changes in Actuarial Assumptions

- The assumed postretirement benefit increase rate was changed from 1.00 percent per year through 2035 and 2.50 percent per year thereafter to 1.00 percent per year for all years.
- The assumed investment return was changed from 7.90 percent to 7.50 percent. The single discount rate changed from .790 percent to .750 percent.
- Other assumptions were changed pursuant to the experience study June 30, 2015. The assumed future salary increases, payroll growth, and inflation were decreased by 0.25 percent to 3.25 percent for payroll growth and 2.50 percent for inflation.
- Changes in Plan Provisions
- There have been no changes since the prior valuation.

**2015 Changes:**

Changes in Actuarial Assumptions

- The assumed postretirement benefit increase rate was changed from 1.00 percent per year through 2030 and 2.50 percent per year thereafter to 1.00 percent per year through 2035 and 2.50 percent per year thereafter.
- Changes in Plan Provisions
- On January 1, 2015, the Minneapolis Employees Retirement Fund was merged into the General Employees Fund, which increased the total pension liability by \$1.1 billion and increased the fiduciary plan net position by \$892 million. Upon consolidation, state and employer contributions were revised; the state's contribution of \$6.0 million, which meets the special funding situation definition, was due September 2015.

**TRA**

**2020 Changes**

Changes in Actuarial Assumptions

- The COLA was reduced from 2.0% each January 1 to 1.0% effective January 1, 2019. Beginning January 1, 2024, the COLA will increase 0.1% each year until reaching the ultimate rate of 1.5% in January 1, 2028.
- Beginning July 1, 2024, eligibility for the first COLA changes to normal retirement age (age 65 to 66, depending on date of birth). However, members who retire under Rule of 90 and members who are at least age 62 with 30 years of service credit are exempt.
- The COLA trigger provision, which would have increased the COLA to 2.5% if the funded ratio was at least 90% for two consecutive years, was eliminated.
- Augmentation in the early retirement reduction factors is phased out over a five-year period beginning July 1, 2019 and ending June 30, 2024 (this reduces early retirement benefits). Members who retire and are at least age 62 with 30 years of service are exempt.
- Augmentation on deferred benefits will be reduced to zero percent beginning July 1, 2019. Interest payable on refunds to members was reduced from 4.0% to 3.0%, effective July 1, 2018. Interest due on payments and purchases from members, employers is reduced from 8.5% to 7.5% effective July 1, 2018.
- The employer contribution rate is increased each July 1 over the next 6 years, (7.71% in 2018, 7.92% in 2019, 8.13% in 2020, 8.34% in 2021, 8.55% in 2022, and 8.75% in 2023). In addition, the employee contribution rate will increase from 7.50% to 7.75% on July 1, 2023. The state provides funding for the higher employer contribution rate through an adjustment in the school aid formula.

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions  
June 30, 2021

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions  
June 30, 2021

Changes in Plan Provisions  
• There have been no changes since the prior valuation.

**2019 Changes**

Changes in Actuarial Assumptions

- The COLA was reduced from 2.0% each January 1 to 1.0%, effective January 1, 2019. Beginning January 1, 2024, the COLA will increase 0.1% each year until reaching the ultimate rate of 1.5% in January 1, 2028. • Beginning July 1, 2024, eligibility for the first COLA changes to normal retirement age (age 65 to 66, depending on date of birth). However, members who retire under Rule of 90 and members who are at least age 62 with 30 years of service are exempt.
- The COLA trigger provision, which would have increased the COLA to 2.5% if the funded ratio was at least 90% for two consecutive years, was eliminated.
- Augmentation in the early retirement reduction factors is phased out over a five-year period beginning July 1, 2019 and ending June 30, 2024 (this reduces early retirement benefits). Members who retire and are at least age 62 with 30 years of service are exempt.
- Augmentation on deferred benefits will be reduced to zero percent beginning July 1, 2019. Interest on payments and purchases from members, employers is reduced from 4.0% to 3.0%, effective July 1, 2018. Interest due on payments and purchases from members, employers was reduced from 8.5% to 7.5%, effective July 1, 2018.
- The employer contribution rate is increased each July 1 over the next 6 years, (7.71% in 2018, 7.92% in 2019, 8.13% in 2020, 8.34% in 2021, 8.55% in 2022, and 8.75% in 2023). In addition, the employee contribution rate will increase from 7.50% to 7.75% on July 1, 2023. The state provides funding for the higher employer contribution rate through an adjustment in the school aid formula.

Changes in Plan Provisions  
• There have been no changes since the prior valuation.

**2018 Changes**

Changes in Actuarial Assumptions

- The discount rate was decreased to 4.66% from 8.0%.
- The cost of living adjustment (COLA) was reduced from 2.0% each January 1 to 1.0%, effective January 1, 2019. Beginning January 1, 2024, the COLA will increase 0.1% each year until reaching the ultimate rate of 1.5% on January 1, 2028.
- Beginning July 1, 2024, eligibility for the first COLA changes to normal retirement age (age 65 to 66, depending on date of birth). However, members who retire under Rule of 90 and members who are at least age 62 with 30 years of service are exempt.
- The COLA trigger provision, which would have increased the COLA to 2.5% if the funded ratio was at least 90% for two consecutive years, was eliminated.
- Augmentation in the early retirement reduction factors is phased out over a five-year period beginning July 1, 2019 and ending July 1, 2024 (this reduces early retirement benefits). Members who retire and are at least age 62 with 30 years of service are exempt.

Changes in Plan Provisions

Changes in Actuarial Assumptions

- Augmentation on deferred benefits will be reduced to zero% beginning July 1, 2019. Interest payable on refunds to members was reduced from 4.0% to 3.0%, effective July 1, 2018. Interest due on payments and purchases from members, employers was reduced from 8.5% to 7.5%, effective July 1, 2018.
  - The employer contribution rate is increased each July 1 over the next six years (7.71% in 2018, 7.92% in 2019, 8.13% in 2020, 8.34% in 2021, 8.55% in 2022, and 8.75% in 2023). In addition, the employee contribution rate will increase from 7.50% to 7.75% on July 1, 2023. The state provides funding for the higher employer contribution rate through an adjustment in the school aid formula.
- There have been no changes since the prior valuation.
- Changes in Plan Provisions
- There have been no changes since the prior valuation.
- 2017 Changes**
- Changes in Actuarial Assumptions
- The discount rate was decreased to 5.12% from 4.66%.
  - The cost of living adjustment (COLA) was assumed to increase from 2.0% annually to 2.5% annually on July 1, 2045.
  - The COLA was not assumed to increase to 2.5% but remain at 2.0% for all future years.
  - Adjustments were made to the combined service annuity loads. The active load was reduced from 1.4% to 0.0%. The vested inactive load increased from 4.0% to 7.0% and the non-vested inactive load increased from 4.0% to 9.0%.
  - The investment return assumption was changed from 8.0% to 7.5%.
  - The price inflation assumption was lowered from 2.75% to 2.5%.
  - The payroll growth assumption was lowered from 2.5% to 3.0%.
  - The general wage growth assumption was lowered from 3.5% to 2.85% for ten years followed by 3.25% thereafter.
  - The salary increase assumption was adjusted to reflect the changes in the general wage growth assumption.
- Changes in Plan Provisions
- Changes in Actuarial Assumptions
- The discount rate was decreased to 4.66% from 8.0%.
  - The price inflation assumption was lowered from 3% to 2.75%.
  - The general wage growth and payroll growth assumptions were lowered from 3.75% to 3.5%.
  - Minor changes as some durations for the merit scale of the salary increase assumption.
  - The pre-retirement mortality assumption was changed to the RP 2014 white collar employee table, male rates set back six years and female rates set back five years. Generational projection uses the MP 2015 scale.
  - The post-retirement mortality assumption was changed to the RP 2014 white collar annuitant table, male rates set back three years and female rates set back three years, with further adjustments of the rates.

Generational projection uses the MP 2015 scale.
- 57
- 58
- A-32

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions  
June 30, 2021

- The post-disability mortality assumption was changed to the RP 2014 disabled retiree mortality table, without adjustment.
- Augmentation in the early retirement reduction factors is phased out o Separate retirement assumptions for members hired before or after July 1, 1989, were created to better reflect each group's behavior in light of different requirements for retirement eligibility.
- Assumed termination rates were changed to be based solely on years of service in order to better fit the observed experience.
- A minor adjustment and simplification of the assumption regarding the election of optional form of annuity payment at retirement were made.
- There have been no changes since the prior valuation.

**Changes in Plan Provisions**  
**2015 Changes**  
Changes of benefit terms:

- The DTRFA was merged into TRA on June 30, 2015.
- Changes in Actuarial Assumptions
- The annual COLA for the June 30, 2015, valuation assumed 2%. The prior year valuation used 2% with an increase to 2.5% commencing in 2034. The discount rate used to measure the total pension liability was 8.0%. This is a decrease from the discount rate at the prior measurement date of 8.25%. Details, if necessary, can be obtained from the TRA Comprehensive Annual Financial Report.

- Changes in Plan Provisions
- None

PERA's Comprehensive Annual Financial Report may be obtained on the PERA's website at [www.mnpera.org](http://www.mnpera.org) for notes to the Schedule of Employer's Share of Net Pension Liability and Schedule of Employer's Contributions. Additional financial and actuarial information can be found in TRA's GASB 67-68 report. Both reports can be obtained at <https://minnesotatra.org>.

Other Supplementary Information  
June 30, 2021

**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**





**Independent School District No. 2889**  
**Lake Park - Audubon Area Public Schools**  
**Schedule of Expenditures of Federal Awards**  
**Year Ended June 30, 2021**

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
 Notes to Schedule of Expenditures of Federal Awards  
 Year Ended June 30, 2021

Federal Grantor/Pass-Through Grant/Program or Cluster Title	Federal Financial Assistance Listing/Federal CFDA Number	Pass-through Entity Identifying Number	Expenditures
<i>Department of Agriculture</i>			
Passed through Minnesota Department of Education			
Child Nutrition Cluster			
'Northwest Center', National School Lunch Program	10.555	2889-01-000 FIN 701	\$ 31,679
Cash Assistance:		2889-01-000 FIN 702	
School Lunch Program/After School Snacks	10.555	2889-01-000 FIN 709	63
Summer Food Service Program	10.559	2889-01-000 FIN 709	574,527
Total Child Nutrition Cluster			\$ 606,279
Department of Treasury			
Passed through Minnesota Department of Education			
COVID-19 Coronavirus Relief Fund	21.019C	2889-01-000 FIN 154	188,027
Passed through Lake Park Township	21.019C	2889-01-000 FIN 174	12,775
COVID-19 Coronavirus Relief Fund	21.019C	2889-01-000 FIN 174	7,675
Passed through City of Lake City	21.019C	2889-01-000 FIN 174	50,950
Passed through Lake Agassiz Cooperative	21.019C	2889-01-000 FIN 174	259,427
Department of Education			
Passed through Minnesota Department of Education			
Title I Grants to Local Educational Agencies	84.010	2889-01-000 FIN 401	88,947
Supporting Effective Instruction State Grants	84.367	2889-01-000 FIN 14	14,362
COVID-19 Education Stabilization Fund - ESSER I	84.425D	2889-01-000 FIN 151	\$ 77,515
COVID-19 Education Stabilization Fund - ESSER II	84.425	2889-01-000 FIN 162	6,426
COVID-19 Education Stabilization Fund - EESSER I	84.425C	2889-01-000 FIN 153	64,302
Total 84.425			148,243
Total Department of Education			251,552
Department of Health and Human Services			
Passed through Minnesota Department of Education			
State Actions to Improve Oral Health Outcomes	93.336	2889-01-000 FIN 499	2,973
Total Federal Financial Assistance			<u>\$ 1,120,231</u>

**Note 1 - Basis of Presentation**

The accompanying schedule of expenditures of federal awards (the schedule) includes the federal grant activity of the District under programs of the federal government for the year ended June 30, 2021. The information is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the schedule presents only a selected portion of the operations of the District, it is not intended to and does not present the financial position or changes in net position/fund balance of the District.

**Note 2 - Summary of Significant Accounting Policies**

Expenditures reported in the schedule are reported on the modified accrual basis of accounting. When applicable, such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. No federal financial assistance has been provided to a subrecipient.

**Note 3 - Indirect Cost Rate**

The District has not elected to use the 10% de minimis cost rate.

**Note 4 - Food Donation**

Nonmonetary assistance is reported in this schedule at the fair market value of the commodities received and disbursed. At June 30, 2021, the District had food commodities totaling \$1,111 in inventory.



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**Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and  
Other Matters Based on an Audit of Financial Statements Performed in Accordance with  
Government Auditing Standards**

Additional Reports  
June 30, 2021

**Lake Park - Audubon Area Public Schools**  
**Independent School District No. 2889**

To the School Board of  
Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Lake Park, Minnesota

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities, and each major fund of independent School District No. 2889, Lake Park - Audubon Area Public Schools (the District), as of and for the year ended June 30, 2021 and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated November 22, 2021.

**Internal Control over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control.

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

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did not identify certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as item 2021-001 to be a material weakness.

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**Compliance and Other Matters**  
As part of obtaining reasonable assurance about whether the District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under Government Auditing Standards.

**Response to Finding**

The District's response to the finding identified in our audit is described in the accompanying schedule of findings and questioned costs. The District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

**Purpose of this Report**

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

*Eide Bailly LLP*

Fargo, North Dakota

November 22, 2021

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

The School Board of  
Lake Park - Audubon Area Public Schools  
Independent School District No. 2889  
Lake Park-Audubon, Minnesota

**Report on Compliance for the Major Federal Programs**

We have audited the District's compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on the District's major federal program for the year ended June 30, 2021. The District's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

**Management's Responsibility**

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

**Auditor's Responsibility**

Our responsibility is to express an opinion on the compliance for the District's major federal program based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2, U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the compliance requirements referred to above that could have a direct and material effect on the major federal program occurred. An audit includes examining, on a test basis, evidence about the District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for the major federal program. However, our audit does not provide a legal determination of the District's compliance.



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**Opinion on the Major Federal Programs**  
In our opinion, the District complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on its major Federal program for the year ended June 30, 2021.

#### Report on Internal Control over Compliance

Management of the District is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the District's internal control over compliance with the types of requirements that could have a direct and material effect on the major Federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for the major Federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over compliance.

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

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

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

*Eide Bailly LLP*  
Fargo, North Dakota  
November 22, 2021

#### Independent Auditor's Report on Minnesota Legal Compliance

To the School Board of  
Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Lake Park, Minnesota

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the Government activities, and each major fund of Lake Park - Audubon Area Public Schools as of and for the year ended June 30, 2021, and the related notes to the financial statements, and have issued our report thereon dated November 22, 2021.

In connection with our audit, nothing came to our attention that caused us to believe that the District failed to comply with the provisions of the contracting and bidding, deposits and investments, conflicts of interest, public indebtedness, claims and disbursements, miscellaneous provisions, and uniform financial accounting and reporting standards sections of the *Minnesota Legal Compliance Audit Guide for School Districts*, promulgated by the State Auditor pursuant to Minn. Stat. § 6.65, insofar as they relate to accounting matters except as described in the schedule of findings and questioned costs as items 2021-002 and 2021-003. However, our audit was not directed primarily toward obtaining knowledge of such noncompliance. Accordingly, had we performed additional procedures, other matters may have come to our attention regarding the District's noncompliance with the above referenced provisions, insofar as they relate to accounting matters.

The District's responses to the findings identified in our audit are described in the accompanying schedule of audit findings and the District's Corrective Action Plan, which is contained in a separate document. The District's responses were not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on them.

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

*Eide Bailly LLP*  
Fargo, North Dakota  
November 22, 2021

Independent School District No. 2889  
 Lake Park - Audubon Area Public Schools  
 Schedule of Findings and Questioned Costs  
 Year Ended June 30, 2021

**Section I – Summary of Auditor's Results**

<b>FINANCIAL STATEMENTS</b>	<b>Section II – Financial Statement Findings</b>		
Type of auditor's report issued	Unmodified	2021-001	<b>Segregation of Duties Material Weakness</b>
Internal control over financial reporting:			
Material weaknesses identified	Yes		<i>Criteria</i> – A good system of internal control requires an adequate segregation of duties so that no one individual has incompatible responsibilities. No one person should have more than one duty relating to the authorization (approval), custody of assets (check signers), record keeping and reconciliation functions.
Significant deficiencies identified not considered to be material weaknesses	None Reported		
Noncompliance material to financial statements noted?	No		<i>Condition</i> – The District has a lack of segregation of duties in certain areas due to a limited staff.
<b>FEDERAL AWARDS</b>			<i>Cause</i> – There is a limited amount of office employees.
Internal control over major program:			<i>Effect</i> – Inadequate segregation of duties could adversely affect the District's ability to detect misstatements in amounts that would be material in relation to the financial statements in a timely period by employees in the normal course of performing their assigned functions.
Material weaknesses identified	No		
Significant deficiencies identified not considered to be material weaknesses	None Reported		
Type of auditor's report issued on compliance for major programs:	Unmodified		<i>Recommendation</i> – While we recognize that your staff may not be large enough to permit complete segregation of duties in all material respects for an effective system of internal control, the functions should be reviewed to determine if additional segregation of duties is feasible and to improve the efficiency and effectiveness of financial management and financial statement accuracy for the District. Segregation of authorization, custody of assets, record keeping, and reconciliation functions would assist in mitigating the risk of fraud or misstatements to the financial statements.
Any audit findings disclosed that are required to be reported in accordance with Uniform Guidance 2 CFR 200.516:	No		
<b>Identification of major programs:</b>			<i>View of Responsible Officials</i> – There is no disagreement with the finding.
Name of Federal Program			<b>Section III –Federal Award Findings and Questioned Costs</b>
Child Nutrition Cluster			
Dollar threshold used to distinguish between type A and type B programs:	\$ 750,000		
Auditee qualified as low-risk auditee?	No		<b>None Reported</b>

Independent School District No. 2889  
Lake Park - Audubon Area Public Schools  
Schedule of Findings and Questioned Costs  
Year Ended June 30, 2021

Section IV – Minnesota Legal Compliance Findings		
<b>2021-002</b>	<b>Inactive Student Activity Accounts with Remaining Cash Balances</b> <b>Uniform Financial Accounting and Reporting Standards Finding</b>	
	<p><i>Criteria</i> – A good system of internal accounting control contemplates an adequate system for compliance with the MAFA guidelines of proper treatment and maintenance of student funds.</p> <p><i>Condition</i> – During the course of our engagement, we noted the Concession Equipment, Drama, Social Studies, Wrestling, Golf, Nature Center Elementary, Cheerleading, LPA Pay Group, FFA, Safe &amp; Drug Free, FCCLA, Spanish, Knowledge Bowl, Volleyball, Elementary Library Fund, and Brick Fundraiser accounts were inactive and not properly disposed of.</p> <p><i>Cause</i> – The District did not follow the procedures to remain in compliance with the MAFA guidelines relating to inactive accounts with remaining balances at year end.</p> <p><i>Effect</i> – Inactive accounts remain unusable on the books.</p>	
	<p><i>Recommendation</i> – The District should monitor accounts activity and dispose of inactive accounts or obtain a written plan from the advisor noting why the student activity should not be disposed of.</p> <p><i>Views of Responsible Officials</i> – There is no disagreement with the audit finding.</p>	
<b>2021-003</b>	<b>Improper Use of Student Activity Funds</b> <b>Uniform Financial Accounting and Reporting Standards Finding</b>	
	<p><i>Criteria</i> – A good system of internal accounting control contemplates an adequate system for compliance with the MAFA guidelines of proper use of student funds. Page 15 of the MAFA guidelines describes gift cards as inappropriate expenditures for student activity accounts.</p> <p><i>Condition</i> – During the course of our engagement, we noted an instance of the student activity funds disbursing funds for gift cards.</p> <p><i>Cause</i> – The District did not follow the procedures in to ensure disbursements were made for appropriate expenditures.</p> <p><i>Effect</i> – The finding could result in public funds being used for the personal gain of individuals.</p>	
	<p><i>Recommendation</i> – District should review the MAFA guidelines to determine which payments are appropriate for student activity accounts.</p> <p><i>Views of Responsible Officials</i> – There is no disagreement with the audit finding.</p>	

## **APPENDIX B**

### **FORM OF LEGAL OPINION**

(See following pages)



Offices in	Fifth Street Towers
Minneapolis	150 South Fifth Street, Suite 700
Saint Paul	Minneapolis, MN 55402
St. Cloud	(612) 337-9300 telephone (612) 337-9310 fax kennedy-graven.com
	Affirmative Action. Equal Opportunity Employer

\$ \_\_\_\_\_  
INDEPENDENT SCHOOL DISTRICT NO. 2889  
(LAKE PARK AUDUBON)  
BECKER, CLAY, AND OTTER TAIL COUNTIES, MINNESOTA  
GENERAL OBLIGATION SCHOOL BUILDING BONDS  
SERIES 2022A

We have acted as bond counsel to Independent School District No. 2889 (Lake Park Audubon), Becker, Clay, and Otter Tail Counties, Minnesota (the "Issuer"), in connection with the issuance by the Issuer of its General Obligation School Building Bonds, Series 2022A (the "Bonds"), originally dated February \_\_\_, 2022, and issued in the original aggregate principal amount of \$\_\_\_\_\_. In such capacity and for the purpose of rendering this opinion we have examined certified copies of certain proceedings, certifications and other documents, and applicable laws as we have deemed necessary. Regarding questions of fact material to this opinion, we have relied on certified proceedings and other certifications of public officials and other documents furnished to us without undertaking to verify the same by independent investigation. Under existing laws, regulations, rulings, and decisions in effect on the date hereof, and based on the foregoing we are of the opinion that:

1. The Bonds have been duly authorized and executed and are valid and binding general obligations of the Issuer, enforceable in accordance with their terms.

2. The principal of and interest on the Bonds are payable from ad valorem taxes levied by the Issuer on all taxable property of the Issuer, but if necessary for the payment thereof, additional ad valorem taxes are required by law to be levied on all taxable property of the Issuer, which taxes are not subject to any limitation as to rate or amount.

3. Interest on the Bonds is excludable from gross income of the recipient for federal income tax purposes and, to the same extent, is excludable from taxable net income of individuals, trusts, and estates for Minnesota income tax purposes, and is not a preference item for purposes of the computation of the federal alternative minimum tax, or the computation of the Minnesota alternative minimum tax imposed on individuals, trusts, and estates. However, such interest is subject to Minnesota franchise taxes on corporations (including financial institutions) measured by income. The opinion set forth in this paragraph is subject to the condition that the Issuer comply with all requirements of the Internal Revenue Code of 1986, as amended, that must be satisfied subsequent to the issuance of the Bonds in order that interest thereon be, or continue to be, excludable from gross income for federal income tax purposes and from taxable net income for Minnesota income tax purposes. The Issuer has covenanted to comply with all such requirements. Failure to comply with certain of such requirements may cause interest on the Bonds to be included in gross income for federal income tax purposes and taxable net income for Minnesota income tax purposes retroactively to the date of issuance of the Bonds. We express no opinion regarding tax consequences arising with respect to the Bonds other than as expressly set forth herein.

4. The rights of the owners of the Bonds and the enforceability of the Bonds may be limited by bankruptcy, insolvency, reorganization, moratorium, and other similar laws affecting creditors' rights generally and by equitable principles, whether considered at law or in equity.

5. The resolution adopted by the School Board of the Issuer on December 20, 2021, obligates the Issuer to be bound by the provisions of Minnesota Statutes, Section 126C.55. We express no opinion as to the enforceability of the provisions of that law against the State of Minnesota (the "State") in the absence of appropriated and available funds to pay the obligations of the State thereunder.

We have not been asked and have not undertaken to review the accuracy, completeness, or sufficiency of the Official Statement or other offering material relating to the Bonds, and accordingly we express no opinion with respect thereto.

This opinion is given as of the date hereof and we assume no obligation to update, revise, or supplement this opinion to reflect any facts or circumstances that may hereafter come to our attention or any changes in law that may hereafter occur.

Dated \_\_\_\_\_, 2022, at Minneapolis, Minnesota.

## **APPENDIX C**

### **BOOK-ENTRY-ONLY SYSTEM**

1. The Depository Trust Company ("DTC"), New York, New York, will act as securities depository for the securities (the "Securities"). The Securities will be issued as fully-registered securities registered in the name of Cede & Co. (DTC's partnership nominee) or such other name as may be requested by an authorized representative of DTC. One fully-registered Security certificate will be issued for [each issue of] the Securities, [each] in the aggregate principal amount of such issue, and will be deposited with DTC. [If, however, the aggregate principal amount of [any] issue exceeds \$500 million, one certificate will be issued with respect to each \$500 million of principal amount, and an additional certificate will be issued with respect to any remaining principal amount of such issue.]
2. DTC, the world's largest securities depository, is a limited-purpose trust company organized under the New York Banking Law, a "banking organization" within the meaning of the New York Banking Law, a member of the Federal Reserve System, a "clearing corporation" within the meaning of the New York Uniform Commercial Code, and a "clearing agency" registered pursuant to the provisions of Section 17A of the Securities Exchange Act of 1934. DTC holds and provides asset servicing for over 3.5 million issues of U.S. and non-U.S. equity issues, corporate and municipal debt issues, and money market instruments (from over 100 countries) that DTC's participants ("Direct Participants") deposit with DTC. DTC also facilitates the post-trade settlement among Direct Participants of sales and other securities transactions in deposited securities, through electronic computerized book-entry transfers and pledges between Direct Participants' accounts. This eliminates the need for physical movement of securities certificates. Direct Participants include both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, clearing corporations, and certain other organizations. DTC is a wholly-owned subsidiary of The Depository Trust & Clearing Corporation ("DTCC"). DTCC is the holding company for DTC, National Securities Clearing Corporation and Fixed Income Clearing Corporation, all of which are registered clearing agencies. DTCC is owned by the users of its regulated subsidiaries. Access to the DTC system is also available to others such as both U.S. and non-U.S. securities brokers and dealers, banks, trust companies, and clearing corporations that clear through or maintain a custodial relationship with a Direct Participant, either directly or indirectly ("Indirect Participants"). DTC has a Standard & Poor's rating of AA+. The DTC Rules applicable to its Participants are on file with the Securities and Exchange Commission. More information about DTC can be found at [www.dtcc.com](http://www.dtcc.com).
3. Purchases of Securities under the DTC system must be made by or through Direct Participants, which will receive a credit for the Securities on DTC's records. The ownership interest of each actual purchaser of each Security ("Beneficial Owner") is in turn to be recorded on the Direct and Indirect Participants' records. Beneficial Owners will not receive written confirmation from DTC of their purchase. Beneficial Owners are, however, expected to receive written confirmations providing details of the transaction, as well as periodic statements of their holdings, from the Direct or Indirect Participant through which the Beneficial Owner entered into the transaction. Transfers of ownership interests in the Securities are to be accomplished by entries made on the books of Direct and Indirect Participants acting on behalf of Beneficial Owners. Beneficial Owners will not receive certificates representing their ownership interests in Securities, except in the event that use of the book-entry system for the Securities is discontinued.
4. To facilitate subsequent transfers, all Securities deposited by Direct Participants with DTC are registered in the name of DTC's partnership nominee, Cede & Co., or such other name as may be requested by an authorized representative of DTC. The deposit of Securities with DTC and their registration in the name of Cede & Co. or such other DTC nominee do not effect any change in beneficial ownership. DTC has no knowledge of the actual Beneficial Owners of the Securities; DTC's records reflect only the identity of the Direct Participants to whose accounts such Securities are credited, which may or may not be the Beneficial Owners. The Direct and Indirect Participants will remain responsible for keeping account of their holdings on behalf of their customers.

5. Conveyance of notices and other communications by DTC to Direct Participants, by Direct Participants to Indirect Participants, and by Direct Participants and Indirect Participants to Beneficial Owners will be governed by arrangements among them, subject to any statutory or regulatory requirements as may be in effect from time to time. [Beneficial Owners of Securities may wish to take certain steps to augment the transmission to them of notices of significant events with respect to the Securities, such as redemptions, tenders, defaults, and proposed amendments to the Security documents. For example, Beneficial Owners of Securities may wish to ascertain that the nominee holding the Securities for their benefit has agreed to obtain and transmit notices to Beneficial Owners. In the alternative, Beneficial Owners may wish to provide their names and addresses to the registrar and request that copies of notices be provided directly to them.]
6. Redemption notices shall be sent to DTC. If less than all of the Securities within an issue are being redeemed, DTC's practice is to determine by lot the amount of the interest of each Direct Participant in such issue to be redeemed.
7. Neither DTC nor Cede & Co. (nor any other DTC nominee) will consent or vote with respect to Securities unless authorized by a Direct Participant in accordance with DTC's MMI Procedures. Under its usual procedures, DTC mails an Omnibus Proxy to District as soon as possible after the record date. The Omnibus Proxy assigns Cede & Co.'s consenting or voting rights to those Direct Participants to whose accounts Securities are credited on the record date (identified in a listing attached to the Omnibus Proxy).
8. Redemption proceeds, distributions, and dividend payments on the Securities will be made to Cede & Co., or such other nominee as may be requested by an authorized representative of DTC. DTC's practice is to credit Direct Participants' accounts upon DTC's receipt of funds and corresponding detail information from the District or Agent, on payable date in accordance with their respective holdings shown on DTC's records. Payments by Participants to Beneficial Owners will be governed by standing instructions and customary practices, as is the case with securities held for the accounts of customers in bearer form or registered in "street name," and will be the responsibility of such Participant and not of DTC, Agent, or the District, subject to any statutory or regulatory requirements as may be in effect from time to time. Payment of redemption proceeds, distributions, and dividend payments to Cede & Co. (or such other nominee as may be requested by an authorized representative of DTC) is the responsibility of the District or Agent, disbursement of such payments to Direct Participants will be the responsibility of DTC, and disbursement of such payments to the Beneficial Owners will be the responsibility of Direct and Indirect Participants.
9. A Beneficial Owner shall give notice to elect to have its Securities purchased or tendered, through its Participant, to [Tender/Remarketing] Agent, and shall effect delivery of such Securities by causing the Direct Participant to transfer the Participant's interest in the Securities, on DTC's records, to [Tender/Remarketing] Agent. The requirement for physical delivery of Securities in connection with an optional tender or a mandatory purchase will be deemed satisfied when the ownership rights in the Securities are transferred by Direct Participants on DTC's records and followed by a book-entry credit of tendered Securities to [Tender/Remarketing] Agent's DTC account.
10. DTC may discontinue providing its services as depository with respect to the Securities at any time by giving reasonable notice to the District or Agent. Under such circumstances, in the event that a successor depository is not obtained, Security certificates are required to be printed and delivered.
11. The District may decide to discontinue use of the system of book-entry-only transfers through DTC (or a successor securities depository). In that event, Security certificates will be printed and delivered to DTC.
12. The information in this section concerning DTC and DTC's book-entry system has been obtained from sources that the District believes to be reliable, but the District takes no responsibility for the accuracy thereof.

## **APPENDIX D**

### **FORM OF CONTINUING DISCLOSURE CERTIFICATE**

(See following pages)

\$\_\_\_\_\_  
INDEPENDENT SCHOOL DISTRICT NO. 2889  
(LAKE PARK AUDUBON)  
BECKER, CLAY, AND OTTER TAIL COUNTIES, MINNESOTA  
GENERAL OBLIGATION SCHOOL BUILDING BONDS  
SERIES 2022A

**CONTINUING DISCLOSURE CERTIFICATE**

February \_\_\_, 2022

This Continuing Disclosure Certificate (the "Disclosure Certificate") is executed and delivered by Independent School District No. 2889 (Lake Park Audubon), Becker, Clay, and Otter Tail Counties, Minnesota (the "District"), in connection with the issuance of its General Obligation School Building Bonds, Series 2022A (the "Bonds"), in the original aggregate principal amount of \$\_\_\_\_\_. The Bonds are being issued pursuant to a resolution adopted by the School Board of the District (the "Resolution"). The Bonds are being delivered to \_\_\_\_\_[, as syndicate manager] (the "Purchaser"), on the date hereof. Pursuant to the Resolution, the District has covenanted and agreed to provide continuing disclosure of certain financial information and operating data and timely notices of the occurrence of certain events. The District hereby covenants and agrees as follows:

Section 1. Purpose of the Disclosure Certificate. This Disclosure Certificate is being executed and delivered by the District for the benefit of the Holders (as defined herein) of the Bonds in order to provide for the public availability of such information and assist the Participating Underwriter(s) (as defined herein) in complying with the Rule (as defined herein). This Disclosure Certificate, together with the Resolution, constitutes the written agreement or contract for the benefit of the Holders of the Bonds that is required by the Rule.

Section 2. Definitions. In addition to the defined terms set forth in the Resolution, which apply to any capitalized term used in this Disclosure Certificate unless otherwise defined in this Section, the following capitalized terms shall have the following meanings:

"Annual Report" means any annual report provided by the District pursuant to, and as described in, Sections 3 and 4 of this Disclosure Certificate.

"Audited Financial Statements" means annual financial statements of the District, prepared in accordance with GAAP as prescribed by GASB.

"Bonds" means the General Obligation School Building Bonds, Series 2022A, issued by the District in the original aggregate principal amount of \$\_\_\_\_\_.

"Disclosure Certificate" means this Continuing Disclosure Certificate.

"District" means Independent School District No. 2889 (Lake Park Audubon), Becker, Clay, and Otter Tail Counties, Minnesota, which is the obligated person with respect to the Bonds.

"EMMA" means the Electronic Municipal Market Access system operated by the MSRB and designated as a nationally-recognized municipal securities information repository and the exclusive portal for complying with the continuing disclosure requirements of the Rule.

“Final Official Statement” means the Final Official Statement, dated January\_\_\_\_, 2022, which constitutes the final official statement delivered in connection with the Bonds, which is available from the MSRB.

“Financial Obligation” means a (a) debt obligation; (b) derivative instrument entered into in connection with, or pledged as security or a source of payment for, an existing or planned debt obligation; or (c) guarantee of a Financial Obligation as described in clause (a) or (b). The term “Financial Obligation” shall not include municipal securities as to which a final official statement has been provided to the MSRB consistent with the Rule.

“Fiscal Year” means the fiscal year of the District.

“GAAP” means generally accepted accounting principles for governmental units as prescribed by GASB.

“GASB” means the Governmental Accounting Standards Board.

“Holder” means the person in whose name a Bond is registered or a beneficial owner of such a Bond.

“Material Event” means any of the events listed in Section 5(a) of this Disclosure Certificate.

“MSRB” means the Municipal Securities Rulemaking Board located at 1300 I Street NW, Suite 1000, Washington, DC 20005.

“Participating Underwriter” means any of the original underwriter(s) of the Bonds (including the Purchaser) required to comply with the Rule in connection with the offering of the Bonds.

“Purchaser” means \_\_\_\_\_ [, as syndicate manager].

“Repository” means EMMA, or any successor thereto designated by the SEC.

“Rule” means SEC Rule 15c2-12(b)(5) promulgated by the SEC under the Securities Exchange Act of 1934, as the same may be amended from time to time, and including written interpretations thereof by the SEC.

“SEC” means Securities and Exchange Commission, and any successor thereto.

### Section 3. Provision of Annual Financial Information and Audited Financial Statements.

(a) The District shall provide to the Repository not later than twelve (12) months after the end of the Fiscal Year commencing with the year that ends June 30, 2022, an Annual Report which is consistent with the requirements of Section 4 of this Disclosure Certificate. The Annual Report may be submitted as a single document or as separate documents comprising a package, and may cross-reference other information as provided in Section 4 of this Disclosure Certificate, provided that the Audited Financial Statements of the District may be submitted separately from the balance of the Annual Report.

(b) If the District is unable or fails to provide to the Repository an Annual Report by the date required in subsection (a), the District shall send a notice of that fact to the Repository and the MSRB.

(c) The District shall determine each year prior to the date for providing the Annual Report the name and address of each Repository.

Section 4. Content of Annual Reports. The District's Annual Report shall contain or incorporate by reference the following sections of the Final Official Statement:

1. Current Property Valuations
2. Direct Debt
3. Tax Levies and Collections
4. Student Body
5. Employment/Unemployment Data

In addition to the items listed above, the Annual Report shall include the most recent Audited Financial Statements submitted in accordance with Section 3 of this Disclosure Certificate.

Any or all of the items listed above may be incorporated by reference from other documents, including official statements of debt issues of the District or related public entities, which have been submitted to the Repository or the SEC. If the document incorporated by reference is a final official statement, it must also be available from the MSRB. The District shall clearly identify each such other document so incorporated by reference.

Section 5. Reporting of Material Events.

(a) This Section 5 shall govern the giving of notice of the occurrence of any of the following events ("Material Events") with respect to the Bonds:

1. Principal and interest payment delinquencies;
2. Non-payment related defaults, if material;
3. Unscheduled draws on debt service reserves reflecting financial difficulties;
4. Unscheduled draws on credit enhancements reflecting financial difficulties;
5. Substitution of credit or liquidity providers, or their failure to perform;
6. Adverse tax opinions, the issuance by the Internal Revenue Service of proposed or final determinations of taxability, Notices of Proposed Issue (IRS Form 5701-TEB), or other material notices or determinations with respect to the tax status of the security, or other material events affecting the tax status of the security;
7. Modifications to rights of security holders, if material;
8. Bond calls, if material, and tender offers;
9. Defeasances;
10. Release, substitution, or sale of property securing repayment of the securities, if material;
11. Rating changes;
12. Bankruptcy, insolvency, receivership or similar event of the obligated person;

13. The consummation of a merger, consolidation, or acquisition involving an obligated person or the sale of all or substantially all of the assets of the obligated person, other than in the ordinary course of business, the entry into a definitive agreement to undertake such an action or the termination of a definitive agreement relating to any such actions, other than pursuant to its terms, if material;
14. Appointment of a successor or additional trustee or the change of name of a trustee, if material;
15. Incurrence of a Financial Obligation of the obligated person, if material, or agreement to covenants, events of default, remedies, priority rights, or other similar terms of a Financial Obligation of the obligated person, any of which affect security holders, if material; and
16. Default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a Financial Obligation of the obligated person, any of which reflect financial difficulties.

(b) The District shall file a notice of such occurrence with the Repository or with the MSRB within ten (10) business days of the occurrence of the Material Event.

(c) Unless otherwise required by law and subject to technical and economic feasibility, the District shall employ such methods of information transmission as shall be requested or recommended by the designated recipients of the District's information.

Section 6. EMMA. The SEC has designated EMMA as a nationally-recognized municipal securities information repository and the exclusive portal for complying with the continuing disclosure requirements of the Rule. Until the EMMA system is amended or altered by the MSRB and the SEC, the District shall make all filings required under this Disclosure Certificate solely with EMMA.

Section 7. Termination of Reporting Obligation. The District's obligations under the Resolution and this Disclosure Certificate shall terminate upon the redemption in full of all Bonds or payment in full of all Bonds.

Section 8. Agent. The District may, from time to time, appoint or engage a dissemination agent to assist it in carrying out its obligations under the Resolution and this Disclosure Certificate, and may discharge any such agent, with or without appointing a successor dissemination agent.

Section 9. Amendment; Waiver. Notwithstanding any other provision of the Resolution or this Disclosure Certificate, the District may amend this Disclosure Certificate, and any provision of this Disclosure Certificate may be waived, if such amendment or waiver is supported by an opinion of nationally-recognized bond counsel to the effect that such amendment or waiver would not, in and of itself, cause a violation of the Rule. The provisions of the Resolution requiring continuing disclosure pursuant to the Rule and this Disclosure Certificate, or any provision hereof, shall be null and void in the event that the District delivers to the Repository an opinion of nationally-recognized bond counsel to the effect that those portions of the Rule which impose the continuing disclosure requirements of the Resolution and the execution and delivery of this Disclosure Certificate are invalid, have been repealed retroactively or otherwise do not apply to the Bonds. The provisions of the Resolution requiring continuing disclosure pursuant to the Rule and this Disclosure Certificate may be amended without the consent of the Holders of the Bonds, but only upon the delivery by the District to the Repository of the proposed amendment and an opinion of nationally-recognized

bond counsel to the effect that such amendment, and giving effect thereto, will not adversely affect compliance with the Rule.

Section 10. Additional Information. Nothing in this Disclosure Certificate shall be deemed to prevent the District from disseminating any other information, using the means of dissemination set forth in this Disclosure Certificate or any other means of communication, or including any other information in any Annual Report or notice of occurrence of a Material Event, in addition to that which is required by this Disclosure Certificate. If the District chooses to include any information in any Annual Report or notice of occurrence of a Material Event in addition to that which is specifically required by this Disclosure Certificate, the District shall have no obligation under this Disclosure Certificate to update such information or include it in any future Annual Report or notice of occurrence of a Material Event.

Section 11. Default. In the event of a failure of the District to comply with any provision of this Disclosure Certificate any Holder of the Bonds may take such actions as may be necessary and appropriate, including seeking mandamus or specific performance by court order, to cause the District to comply with its obligations under the Resolution and this Disclosure Certificate. A default under this Disclosure Certificate shall not be deemed an event of default with respect to the Bonds and the sole remedy under this Disclosure Certificate in the event of any failure of the District to comply with this Disclosure Certificate shall be an action to compel performance.

Section 12. Beneficiaries. This Disclosure Certificate shall inure solely to the benefit of the District, the Participating Underwriters, and the Holders from time to time of the Bonds, and shall create no rights in any other person or entity.

(The remainder of this page is intentionally left blank.)

IN WITNESS WHEREOF, we have executed this Disclosure Certificate in our official capacities effective as of the date and year first written above.

**INDEPENDENT SCHOOL DISTRICT NO. 2889  
(LAKE PARK AUDUBON), BECKER, CLAY, AND  
OTTER TAIL COUNTIES, MINNESOTA**

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Board Chair

---

Clerk

## **APPENDIX E**

### **TERMS OF PROPOSAL**

#### **\$22,960,000\* GENERAL OBLIGATION SCHOOL BUILDING BONDS, SERIES 2022A INDEPENDENT SCHOOL DISTRICT NO. 2889 (LAKE PARK AUDUBON), MINNESOTA**

Proposals for the purchase of \$22,960,000\* General Obligation School Building Bonds, Series 2022A (the "Bonds") of Independent School District No. 2889 (Lake Park Audubon), Minnesota (the "District") will be received at the offices of Ehlers and Associates, Inc. ("Ehlers"), 3060 Centre Pointe Drive, Roseville, Minnesota 55113-1105, municipal advisors to the District, until 10:30 A.M., Central Time, and **ELECTRONIC PROPOSALS** will be received via **PARITY**, in the manner described below, until 10:30 A.M. Central Time, on January 24, 2022, at which time they will be opened, read and tabulated. The proposals will be presented to the School Board for consideration for award by resolution at a meeting to be held at 6:30 P.M., Central Time, on the same date. The proposal offering to purchase the Bonds upon the terms specified herein and most favorable to the District will be accepted unless all proposals are rejected.

#### **PURPOSE**

The Bonds are being issued pursuant to Minnesota Statutes, Chapter 475, and a special election held November 2, 2021 by the District for the purpose of financing the acquisition and betterment of school sites and facilities in the District. The Bonds will be general obligations of the District for which its full faith and credit and taxing powers are pledged.

#### **DATES AND MATURITIES**

The Bonds will be dated February 17, 2022, will be issued as fully registered Bonds in the denomination of \$5,000 each, or any integral multiple thereof, and will mature on February 1 as follows:

<u>Year</u>	<u>Amount*</u>	<u>Year</u>	<u>Amount*</u>	<u>Year</u>	<u>Amount*</u>
2027	\$40,000	2033	\$1,490,000	2039	\$1,785,000
2028	340,000	2034	1,540,000	2040	1,840,000
2029	1,245,000	2035	1,585,000	2041	1,890,000
2030	1,345,000	2036	1,635,000	2042	1,950,000
2031	1,410,000	2037	1,680,000		
2032	1,450,000	2038	1,735,000		

#### **ADJUSTMENT OPTION**

\* The District reserves the right to increase or decrease the principal amount of the Bonds on the day of sale, in increments of \$5,000 each. Increases or decreases may be made in any maturity. If any principal amounts are adjusted, the purchase price proposed will be adjusted to maintain the same gross spread per \$1,000.

#### **TERM BOND OPTION**

Proposals for the Bonds may contain a maturity schedule providing for any combination of serial bonds and term bonds, subject to mandatory redemption, so long as the amount of principal maturing or subject to mandatory redemption in each year conforms to the maturity schedule set forth above. All dates are inclusive.

## **INTEREST PAYMENT DATES AND RATES**

Interest will be payable on February 1 and August 1 of each year, commencing August 1, 2022, to the registered owners of the Bonds appearing of record in the bond register as of the close of business on the 15th day (whether or not a business day) of the immediately preceding month. Interest will be computed upon the basis of a 360-day year of twelve 30-day months and will be rounded pursuant to rules of the Municipal Securities Rulemaking Board. **The rate for any maturity may not be more than 2.00% less than the rate for any preceding maturity. (For example, if a rate of 4.50% is proposed for the 2027 maturity, then the lowest rate that may be proposed for any later maturity is 2.50%.)** All Bonds of the same maturity must bear interest from date of issue until paid at a single, uniform rate. Each rate must be expressed in an integral multiple of 5/100 or 1/8 of 1%.

## **BOOK-ENTRY-ONLY FORMAT**

Unless otherwise specified by the purchaser, the Bonds will be designated in the name of Cede & Co., as nominee for The Depository Trust Company, New York, New York ("DTC"). DTC will act as securities depository for the Bonds, and will be responsible for maintaining a book-entry system for recording the interests of its participants and the transfers of interests between its participants. The participants will be responsible for maintaining records regarding the beneficial interests of the individual purchasers of the Bonds. So long as Cede & Co. is the registered owner of the Bonds, all payments of principal and interest will be made to the depository which, in turn, will be obligated to remit such payments to its participants for subsequent disbursement to the beneficial owners of the Bonds.

## **PAYING AGENT**

The District has selected Bond Trust Services Corporation, Roseville, Minnesota, to act as paying agent (the "Paying Agent"). Bond Trust Services Corporation and Ehlers are affiliate companies. The District will pay the charges for Paying Agent services. The District reserves the right to remove the Paying Agent and to appoint a successor.

## **OPTIONAL REDEMPTION**

At the option of the District, the Bonds maturing on or after February 1, 2031 shall be subject to optional redemption prior to maturity on February 1, 2030 or any date thereafter, at a price of par plus accrued interest to the date of optional redemption.

Redemption may be in whole or in part of the Bonds subject to prepayment. If redemption is in part, the selection of the amounts and maturities of the Bonds to be redeemed shall be at the discretion of the District. If only part of the Bonds having a common maturity date are called for redemption, then the District or Paying Agent, if any, will notify DTC of the particular amount of such maturity to be redeemed. DTC will determine by lot the amount of each participant's interest in such maturity to be redeemed and each participant will then select by lot the beneficial ownership interest in such maturity to be redeemed.

Notice of redemption shall be sent by mail not more than 60 days and not less than 30 days prior to the date fixed for redemption to the registered owner of each Bond to be redeemed at the address shown on the registration books.

## **DELIVERY**

On or about February 17, 2022, the Bonds will be delivered without cost to the winning bidder at DTC. On the day of closing, the District will furnish to the winning bidder the opinion of bond counsel hereinafter described, an arbitrage certification, and certificates verifying that no litigation in any manner questioning the validity of the Bonds is then pending or, to the best knowledge of officers of the District, threatened. Payment for the Bonds must be received by the District at its designated depository on the date of closing in immediately available funds.

## **LEGAL OPINION**

An opinion as to the validity of the Bonds and the exemption from taxation of the interest thereon will be furnished by Kennedy & Graven, Chartered, Minneapolis, Minnesota, Bond Counsel to the District, and will be available at the time of delivery of the Bonds. The legal opinion will state that the Bonds are valid and binding general obligations of the District; provided that the rights of the owners of the Bonds and the enforceability of the Bonds may be limited by bankruptcy, insolvency, reorganization, moratorium, and other similar laws affecting creditors' rights and by equitable principles (which may be applied in either a legal or equitable proceeding). See "FORM OF LEGAL OPINION" found in Appendix B.

## **SUBMISSION OF PROPOSALS**

Proposals must not be for less than \$22,960,000 **nor more than \$24,337,600** plus accrued interest on the principal sum of \$22,960,000 from date of original issue of the Bonds to date of delivery. Prior to the time established above for the opening of proposals, interested parties may submit a proposal as follows:

- 1) Electronically to [bondsale@ehlers-inc.com](mailto:bondsale@ehlers-inc.com); or
- 2) Electronically via **PARITY** in accordance with this Terms of Proposal until 10:30 A.M. Central Time, but no proposal will be received after the time for receiving proposals specified above. To the extent any instructions or directions set forth in **PARITY** conflict with this Terms of Proposal, the terms of this Terms of Proposal shall control. For further information about **PARITY**, potential bidders may contact Ehlers or i-Deal LLC at 1359 Broadway, 2<sup>nd</sup> Floor, New York, New York 10018, Telephone (212) 849-5021.

Proposals must be submitted to Ehlers via one of the methods described above and must be received prior to the time established above for the opening of proposals. Each proposal must be unconditional except as to legality. Neither the District nor Ehlers shall be responsible for any failure to receive a facsimile submission.

**A good faith deposit ("Deposit") in the amount of \$459,200 shall be made by the winning bidder by wire transfer of funds. Such Deposit shall be received by Ehlers no later than two hours after the proposal opening time. Wire transfer instructions will be provided to the winning bidder by Ehlers after the tabulation of proposals.** The District reserves the right to award the Bonds to a winning bidder whose wire transfer is initiated but not received by such time provided that such winning bidder's federal wire reference number has been received by such time. In the event the Deposit is not received as provided above, the District may award the Bonds to the bidder submitting the next best proposal provided such bidder agrees to such award. The Deposit will be retained by the District as liquidated damages if the proposal is accepted and the Purchaser fails to comply therewith.

The District and the winning bidder who chooses to so wire the Deposit hereby agree irrevocably that Ehlers shall be the escrow holder of the Deposit wired to such account subject only to these conditions and duties: 1) All income earned thereon shall be retained by the escrow holder as payment for its expenses; 2) If the proposal is not accepted, Ehlers shall, at its expense, promptly return the Deposit amount to the winning bidder; 3) If the proposal is accepted, the Deposit shall be returned to the winning bidder at the closing; 4) Ehlers shall bear all costs of maintaining the escrow account and returning the funds to the winning bidder; 5) Ehlers shall not be an insurer of the Deposit amount and shall have no liability hereunder except if it willfully fails to perform or recklessly disregards, its duties specified herein; and 6) FDIC insurance on deposits within the escrow account shall be limited to \$250,000 per bidder.

No proposal can be withdrawn after the time set for receiving proposals unless the meeting of the District scheduled for award of the Bonds is adjourned, recessed, or continued to another date without award of the Bonds having been made.

## **AWARD**

The Bonds will be awarded to the bidder offering the lowest interest rate to be determined on a True Interest Cost (TIC) basis. The District's computation of the interest rate of each proposal, in accordance with customary practice, will be controlling. In the event of a tie, the sale of the Bonds will be awarded by lot. The District reserves the right to reject any and all proposals and to waive any informality in any proposal.

## **BOND INSURANCE**

If the Bonds are qualified for any bond insurance policy, the purchase of such policy shall be at the sole option and expense of the winning bidder. Any cost for such insurance policy is to be paid by the winning bidder, except that, if the District requested and received a rating on the Bonds from a rating agency, the District will pay that rating fee. Any rating agency fees not requested by the District are the responsibility of the winning bidder.

Failure of the municipal bond insurer to issue the policy after the Bonds are awarded to the winning bidder shall not constitute cause for failure or refusal by the winning bidder to accept delivery of the Bonds.

## **CUSIP NUMBERS**

The District will assume no obligation for the assignment or printing of CUSIP numbers on the Bonds or for the correctness of any numbers printed thereon, but will permit such numbers to be printed at the expense of the winning bidder, if the winning bidder waives any delay in delivery occasioned thereby.

## **NON-QUALIFIED TAX-EXEMPT OBLIGATIONS**

The District will NOT designate the Bonds as "qualified tax-exempt obligations" pursuant to Section 265 of the Internal Revenue Code of 1986, as amended, which permits financial institutions to deduct interest expenses allocable to the Bonds to the extent permitted under prior law.

## **CONTINUING DISCLOSURE**

In order to assist the Underwriters in complying with the provisions of Rule 15c2-12 promulgated by the Securities and Exchange Commission under the Securities Exchange Act of 1934 the District will enter into an undertaking for the benefit of the holders of the Bonds. A description of the details and terms of the undertaking is set forth in Appendix D of the Preliminary Official Statement.

## **NEW ISSUE PRICING**

The winning bidder will be required to provide, in a timely manner, certain information necessary to compute the yield on the Bonds pursuant to the provisions of the Internal Revenue Code of 1986, as amended, and to provide a certificate which will be provided by Bond Counsel upon request.

(a) The winning bidder shall assist the District in establishing the issue price of the Bonds and shall execute and deliver to the District at closing an "issue price" or similar certificate satisfactory to Bond Counsel setting forth the reasonably expected initial offering price to the public or the sales price or prices of the Bonds, together with the supporting pricing wires or equivalent communications. All actions to be taken by the District under this Terms of Proposal to establish the issue price of the Bonds may be taken on behalf of the District by the District's municipal advisor identified herein and any notice or report to be provided to the District may be provided to the District's municipal advisor.

(b) The District intends that the provisions of Treasury Regulation Section 1.148-1(f)(3)(i) (defining "competitive sale" for purposes of establishing the issue price of the Bonds) will apply to the initial sale of the Bonds (the "competitive sale requirements") because:

- (1) The District shall disseminate this Terms of Proposal to potential underwriters in a manner that is reasonably designed to reach potential investors;
- (2) all bidders shall have an equal opportunity to bid;
- (3) the District may receive proposals from at least three underwriters of municipal bonds who have established industry reputations for underwriting new issuances of municipal bonds; and
- (4) the District anticipates awarding the sale of the Bonds to the bidder who submits a firm offer to purchase the Bonds at the highest price (or lowest interest cost), as set forth in this Terms of Proposal.

Any proposal submitted pursuant to this Terms of Proposal shall be considered a firm offer for the purchase of the Bonds, as specified in this proposal.

(c) If all of the requirements of a "competitive sale" are not satisfied, the District shall advise the winning bidder of such fact prior to the time of award of the sale of the Bonds to the winning bidder. In such event, any proposal submitted will not be subject to cancellation or withdrawal and the District agrees to use the rule selected by the winning bidder on its proposal form to determine the issue price for the Bonds. On its proposal form, each bidder must select one of the following two rules for determining the issue price of the Bonds: (1) the first price at which 10% of a maturity of the Bonds (the "10% test") is sold to the public as the issue price of that maturity or (2) the initial offering price to the public as of the sale date as the issue price of each maturity of the Bonds (the "hold-the-offering-price rule").

(d) If all of the requirements of a "competitive sale" are not satisfied and the winning bidder selects the hold-the-offering-price rule, the winning bidder shall (i) confirm that the underwriters have offered or will offer the Bonds to the public on or before the date of award at the offering price or prices (the "initial offering price"), or at the corresponding yield or yields, set forth in the proposal submitted by the winning bidder and (ii) agree, on behalf of the underwriters participating in the purchase of the Bonds, that the underwriters will neither offer nor sell unsold Bonds of any maturity to which the hold-the-offering-price rule shall apply to any person at a price that is higher than the initial offering price to the public during the period starting on the sale date and ending on the earlier of the following:

- (1) the close of the fifth (5<sup>th</sup>) business day after the sale date; or
- (2) the date on which the underwriters have sold at least 10% of that maturity of the Bonds to the public at a price that is no higher than the initial offering price to the public.

The winning bidder will advise the District promptly after the close of the fifth (5<sup>th</sup>) business day after the sale whether it has sold 10% of that maturity of the Bonds to the public at a price that is no higher than the initial offering price to the public.

The District acknowledges that in making the representation set forth above, the winning bidder will rely on:

(i) the agreement of each underwriter to comply with requirements for establishing issue price of the Bonds, including, but not limited to, its agreement to comply with the hold-the-price rule, if applicable to the Bonds, as set forth in an agreement among underwriters and the related pricing wires,

(ii) in the event a selling group has been created in connection with the initial sale of the Bonds to the public, the agreement of each dealer who is a member of the selling group to comply with the requirements for establishing issue price of the Bonds, including, but not limited to, its agreement to comply with the hold-the-offering-price rule, if applicable to the Bonds, as set forth in a selling group agreement and the related pricing wires, and

(iii) in the event that an underwriter or dealer who is a member of the selling group is a party to a third-party distribution agreement that was employed in connection with the initial sale of the Bonds to the public, the agreement of each broker-dealer that is party to such agreement to comply with the requirements for establishing issue price of the Bonds, including, but not limited to, its agreement to comply with the hold-the-offering-price rule, if applicable to the Bonds, as set forth in the third-party distribution agreement and the related pricing wires. The District further acknowledges that each underwriter shall be solely liable for its failure to comply with its agreement regarding the requirements for establishing issue price rule of the Bonds, including, but not limited to, its agreement to comply with the hold-the-offering-price rule, if applicable to the Bonds, and that no underwriter shall be liable for the failure of any other underwriter, or of any dealer who is a member of a selling group, or of any broker-dealer that is a party to a third-party distribution agreement to comply with its corresponding agreement to comply with the requirements for establishing issue price of the Bonds, including, but not limited to, its agreement to comply with the hold-the-offering-price rule as applicable to the Bonds.

(e) If all of the requirements of a "competitive sale" are not satisfied and the winning bidder selects the 10% test, the winning bidder agrees to promptly report to the District, Bond Counsel and Ehlers the prices at which the Bonds have been sold to the public. That reporting obligation shall continue, whether or not the closing date has occurred, until either (i) all Bonds of that maturity have been sold or (ii) the 10% test has been satisfied as to each maturity of the Bonds, provided that, the winning bidder's reporting obligation after the Closing Date may be at reasonable periodic intervals or otherwise upon request of the District or bond counsel.

(f) By submitting a proposal, each bidder confirms that:

(i) any agreement among underwriters, any selling group agreement and each third-party distribution agreement (to which the bidder is a party) relating to the initial sale of the Bonds to the public, together with the related pricing wires, contains or will contain language obligating each underwriter, each dealer who is a member of the selling group, and each broker-dealer that is party to such third-party distribution agreement, as applicable, to:

(A) report the prices at which it sells to the public the unsold Bonds of each maturity allocated to it, whether or not the Closing Date has occurred until either all securities of that maturity allocated to it have been sold or it is notified by the winning bidder that either the 10% test has been satisfied as to the Bonds of that maturity, provided that, the reporting obligation after the Closing Date may be at reasonable periodic intervals or otherwise upon request of the District or bond counsel.

(B) comply with the hold-the-offering-price rule, if applicable, in each case if and for so long as directed by the winning bidder and as set forth in the related pricing wires, and

(ii) any agreement among underwriters or selling group agreement relating to the initial sale of the Bonds to the public, together with the related pricing wires, contains or will contain language obligating each underwriter, each dealer who is a member of the selling group and each broker dealer that is a party to a third-party distribution agreement to be employed in connection with the initial sale of the Bonds to the public to require each broker-dealer that is a party to such third-party distribution agreement to:

(A) to promptly notify the winning bidder of any sales of Bonds that, to its knowledge, are made to a purchaser who is a related party to an underwriter participating in the initial sale of the Bonds to the public (each such term being used as defined below), and

(B) to acknowledge that, unless otherwise advised by the underwriter, dealer or broker-dealer, the winning bidder shall assume that each order submitted by the underwriter, dealer or broker-dealer is a sale to the public.

(g) Sales of any Bonds to any person that is a related party to an underwriter participating in the initial sale of the Bonds to the public (each term being used as defined below) shall not constitute sales to the public for purposes of this Terms of Proposal. Further, for purposes of this Terms of Proposal:

- (i) "public" means any person other than an underwriter or a related party,
- (ii) "underwriter" means (A) any person that agrees pursuant to a written contract with the District (or with the lead underwriter to form an underwriting syndicate) to participate in the initial sale of the Bonds to the public and (B) any person that agrees pursuant to a written contract directly or indirectly with a person described in clause (A) to participate in the initial sale of the Bonds to the public (including a member of a selling group or a party to a third-party distribution agreement participating in the initial sale of the Bonds to the public),
- (iii) a purchaser of any of the Bonds is a "related party" to an underwriter if the underwriter and the purchaser are subject, directly or indirectly, to (A) more than 50% common ownership of the voting power or the total value of their stock, if both entities are corporations (including direct ownership by one corporation of another), (B) more than 50% common ownership of their capital interests or profits interests, if both entities are partnerships (including direct ownership by one partnership of another), or (C) more than 50% common ownership of the value of the outstanding stock of the corporation or the capital interests or profit interests of the partnership, as applicable, if one entity is a corporation and the other entity is a partnership (including direct ownership of the applicable stock or interests by one entity of the other), and
- (iv) "sale date" means the date that the Bonds are awarded by the District to the winning bidder.

### **PRELIMINARY OFFICIAL STATEMENT**

Bidders may obtain a copy of the Preliminary Official Statement relating to the Bonds prior to the proposal opening by request from Ehlers at [www.ehlers-inc.com](http://www.ehlers-inc.com) by connecting to the Bond Sales link. The Syndicate Manager will be provided with an electronic copy of the Final Official Statement within seven business days of the proposal acceptance. Up to 10 printed copies of the Final Official Statement will be provided upon request. Additional copies of the Final Official Statement will be available at a cost of \$10.00 per copy.

Information for bidders and proposal forms may be obtained from Ehlers at 3060 Centre Pointe Drive, Roseville, Minnesota 55113-1105, Telephone (651) 697-8500.

By Order of the School Board

Independent School District No. 2889  
(Lake Park Audubon), Minnesota

# PROPOSAL FORM

The School Board

Independent School District No. 2889 (Lake Park Audubon), Minnesota (the "District")

January 24, 2022

RE: \$22,960,000\* General Obligation School Building Bonds, Series 2022A (the "Bonds")  
DATED: February 17, 2022

For all or none of the above Bonds, in accordance with the Terms of Proposal and terms of the Global Book-Entry System (unless otherwise specified by the Purchaser) as stated in this Official Statement, we will pay you \$ \_\_\_\_\_ (not less than \$22,960,000 **and not more than \$24,337,600**) plus accrued interest to date of delivery for fully registered Bonds bearing interest rates and maturing in the stated years as follows:

_____ % due	2027	_____ % due	2033	_____ % due	2039
_____ % due	2028	_____ % due	2034	_____ % due	2040
_____ % due	2029	_____ % due	2035	_____ % due	2041
_____ % due	2030	_____ % due	2036	_____ % due	2042
_____ % due	2031	_____ % due	2037		
_____ % due	2032	_____ % due	2038		

\* The District reserves the right to increase or decrease the principal amount of the Bonds on the day of sale, in increments of \$5,000 each. Increases or decreases may be made in any maturity. If any principal amounts are adjusted, the purchase price proposed will be adjusted to maintain the same gross spread per \$1,000.

**The rate for any maturity may not be more than 2.00% less than the rate for any preceding maturity. (For example, if a rate of 4.50% is proposed for the 2027 maturity, then the lowest rate that may be proposed for any later maturity is 2.50%.) All Bonds of the same maturity must bear interest from date of issue until paid at a single, uniform rate. Each rate must be expressed in an integral multiple of 5/100 or 1/8 of 1%.**

**A good faith deposit ("Deposit") in the amount of \$459,200 shall be made by the winning bidder by wire transfer of funds. Such Deposit shall be received by Ehlers no later than two hours after the proposal opening time. Wire transfer instructions will be provided to the winning bidder by Ehlers after the tabulation of proposals.** The District reserves the right to award the Bonds to a winning bidder whose wire transfer is initiated but not received by such time provided that such winning bidder's federal wire reference number has been received by such time. In the event the Deposit is not received as provided above, the District may award the Bonds to the bidder submitting the next best proposal provided such bidder agrees to such award. The Deposit will be retained by the District as liquidated damages if the proposal is accepted and the Purchaser fails to comply therewith. We agree to the conditions and duties of Ehlers and Associates, Inc., as escrow holder of the Deposit, pursuant to the Terms of Proposal. This proposal is for prompt acceptance and is conditional upon delivery of said Bonds to The Depository Trust Company, New York, New York, in accordance with the Terms of Proposal. Delivery is anticipated to be on or about February 17, 2022.

This proposal is subject to the District's agreement to enter into a written undertaking to provide continuing disclosure under Rule 15c2-12 promulgated by the Securities and Exchange Commission under the Securities Exchange Act of 1934 as described in the Preliminary Official Statement for the Bonds.

We have received and reviewed the Official Statement, and any addenda thereto, and have submitted our requests for additional information or corrections to the Final Official Statement. As Syndicate Manager, we agree to provide the District with the reoffering price of the Bonds within 24 hours of the proposal acceptance.

This proposal is a firm offer for the purchase of the Bonds identified in the Terms of Proposal, on the terms set forth in this proposal form and the Terms of Proposal, and is not subject to any conditions, except as permitted by the Terms of Proposal.

By submitting this proposal, we confirm that we are an underwriter and have an established industry reputation for underwriting new issuances of municipal bonds. YES: \_\_\_\_ NO: \_\_\_\_.

If the competitive sale requirements are not met, we elect to use either the: \_\_\_\_ 10% test, or the \_\_\_\_ hold-the-offering-price rule to determine the issue price of the Bonds.

Account Manager: \_\_\_\_\_ By: \_\_\_\_\_  
Account Members: \_\_\_\_\_

**Award will be on a true interest cost basis.** According to our computations (the correct computation being controlling in the award), the total dollar interest cost (including any discount or less any premium) computed from February 17, 2022 of the above proposal is \$ \_\_\_\_\_ and the true interest cost (TIC) is \_\_\_\_\_ %.

The foregoing offer is hereby accepted by and on behalf of the School Board of Independent School District No. 2889 (Lake Park Audubon), Minnesota, on January 24, 2022.

By: \_\_\_\_\_ Title: \_\_\_\_\_  
Title: \_\_\_\_\_