



**Helping People with Disabilities
Achieve Financial Security
and Independence.**



Industry Overview and RFP Results

October 12, 2017

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Section 1.

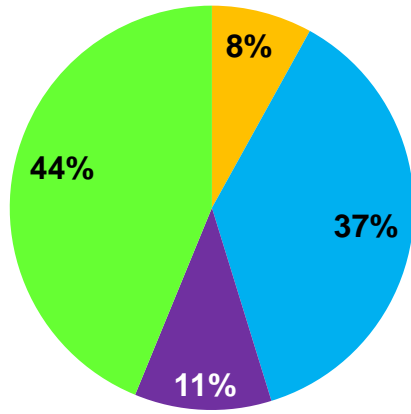
Current ABLE Market Information

Available ABLÉ Plans

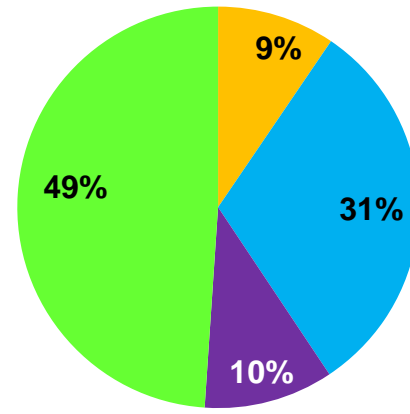
	ABLE Alliance	Independent Plans	Ohio Partner States	Nebraska Partner States
States	Alaska Colorado District of Columbia Illinois Indiana Iowa Kansas Minnesota Montana Nevada North Carolina Pennsylvania Rhode Island	Florida Louisiana Massachusetts Michigan New York Oregon Tennessee Virginia	Ohio Georgia Kentucky Missouri Vermont	Nebraska Alabama
Total	13 States	8 States	5 States	2 States
Expected Launches	New Jersey	Maryland (OR) Washington (OR) Texas	South Carolina	--

Overall ABL Market

Assets



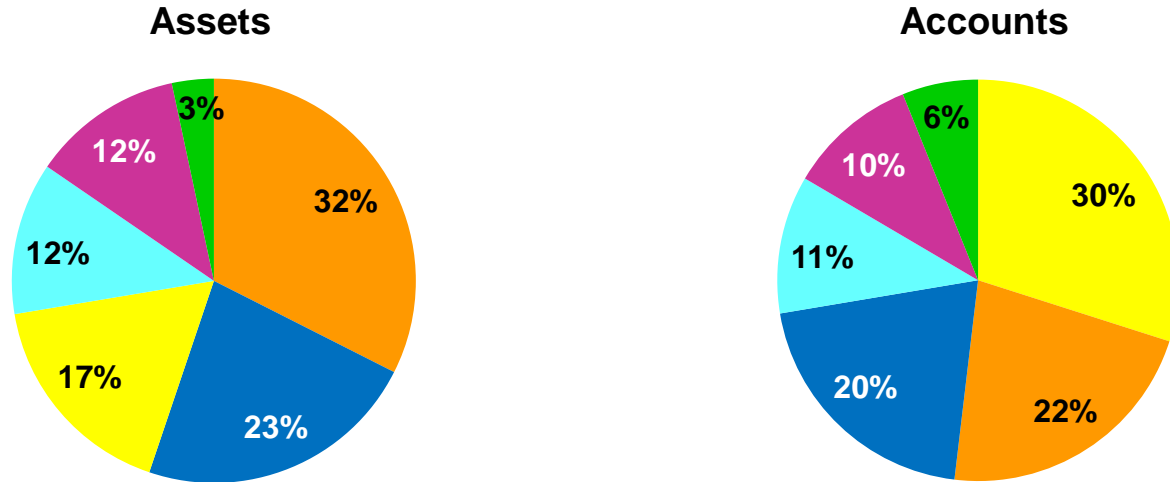
Accounts



	Assets	Accounts	Average Account Size
ABLE Alliance	\$2,972,154	984	\$3,020
Ohio Partner States	\$13,741,513	3,226	\$4,260
Nebraska Partner States	\$4,053,590	1,079	\$3,757
Independent Plans	\$16,177,528	5,069	\$3,191
Industry Total	\$36,944,785	10,358	\$3,567

Source: Assets and accounts data from Strategic Insight as of June 30, 2017

Status of Independent Plans



	Launch Date	Assets	Accounts	Average Account Size
Tennessee	6/10/16	\$5,250,309	1,113	\$4,717
Florida	7/1/16	\$3,676,241	1,038	\$3,542
Virginia	12/19/16	\$2,780,851	1,517	\$1,833
Oregon	12/6/16	\$1,972,472	563	\$3,504
Michigan	11/1/16	\$1,957,054	528	\$3,707
Massachusetts	5/10/17	\$540,601	310	\$1,744
Total		\$16,177,528	5,069	\$3,191

Source: Assets and accounts data from Strategic Insight as of June 30, 2017

Notes: Plans are listed by asset size. Louisiana and New York launched after June 30, 2017

Section 2.

Third Party Service Providers

Largest Program Managers

Service Provider	States
Ascensus	National ABLA Alliance (13 States) New York
Intuition	OH Partnership (5 States) Florida*
First National Bank of Omaha	NE Partnership (2 States)
BNY Mellon	Oregon
Fidelity	Massachusetts
PNC Bank	Virginia

Source: Program Disclosure Statements available as of August 23, 2017

*Services rebid; new engagement not finalized

Other service providers include TSA Consulting (MI) and Envision (TN), however, Tennessee is expected to announce the results of an RFP for ABLA Program Management soon

Presence of Investment Managers

Investment Manager	States
Vanguard	National ABLA Alliance (13 Plans) NE Partnership (2 Plans) OH Partnership (5 Plans) FL LA MI NY OR TN VA
BlackRock	National ABLA Alliance FL
Schwab	National ABLA Alliance
DFA	MI OR TN
Fidelity	MA VA

Source: Program Disclosure Statements available as of August 23, 2017

Section 3.

Plan Features

Minimum Contributions

Initial Minimum Contribution	Contribution	State
	\$0	FL VA
	\$10	LA
	\$25	National ABLÉ Alliance MI ¹ NY ¹ OR TN
	\$50	NE Partnership ² MA ¹ OH

Subsequent Minimum Contribution	Contribution	State
	\$0	FL LA TN VA
	\$1	OH Partnership
	\$10	OR
	\$25	National ABLÉ Alliance MA ¹ MI ³ NE ³ NY ¹

Source: Program Disclosure Statements available as of August 23, 2017

¹ \$15 for AIP

² \$25 for AIP

³ \$0 for AIP

Card Features

State	Card Type	Investment Option Directly Linked To:	Service Fees
ABLE Alliance	Debit	Not Specified	\$2 per month \$2.75 for non-network ATMs
Nebraska Partnership	Debit	Checking	\$2 per month
Ohio Partnership	Prepaid	Not Linked	\$0.49 per transaction with a PIN
Massachusetts	Debit	Not Linked	None
New York	Debit	Checking	Same as Alliance
Oregon	Prepaid	Not Linked	\$1.25 per month
Virginia	Debit	FDIC-insured	None
California Proposed	Debit	Investment Account	None

Source: Program Disclosure Statements available as of August 23, 2017

Plans in Florida, Louisiana and Tennessee do not offer a card option; Michigan is expected to launch one in 2017

Section 4.

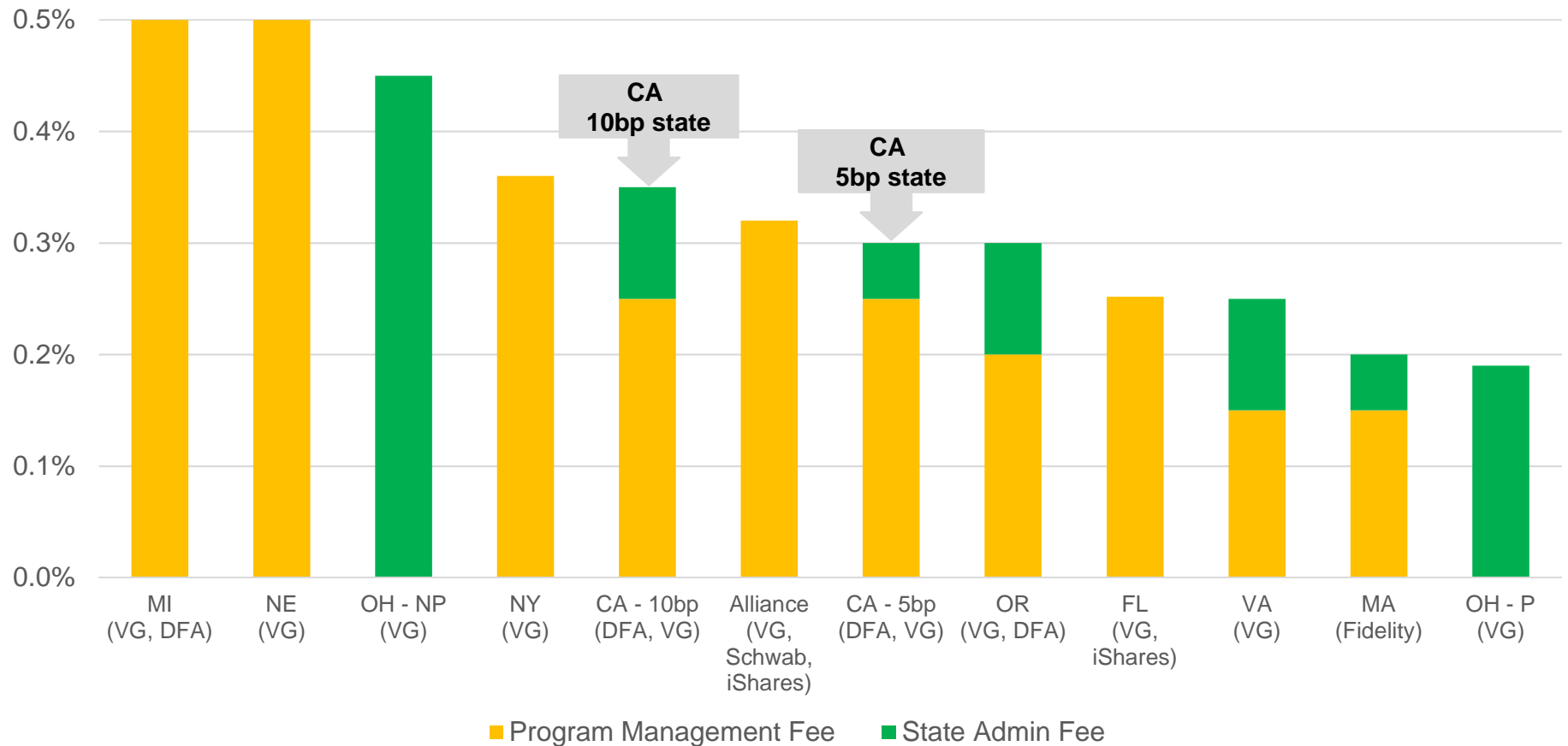
Fees

Asset-Based Management Fees

Plan	Program Management Fee	State Admin Fee
Michigan	0.50%	--
NE Partnership	0.50%	--
New York	0.36 - 0.38%	Included, if any
National ABLE Alliance	0.32%	--
California Proposed	0.25% for all except: 0.05% for Ultrashort Prime 0.10% for ANOVA	0.05% - 0.10%
Oregon	0.20%	0.10%
Virginia	0.15%	0.10%
Massachusetts	0.15%	0.05%
Tennessee	--	0 - 0.31%
OH Partner States	--	0.19%
OH Non-Partner States	--	0.45%
Florida	Not specified	Not specified

Source: Program Disclosure Statements available as of August 23, 2017. Does not include Louisiana

Example: Asset-Based Management Fee Comparison

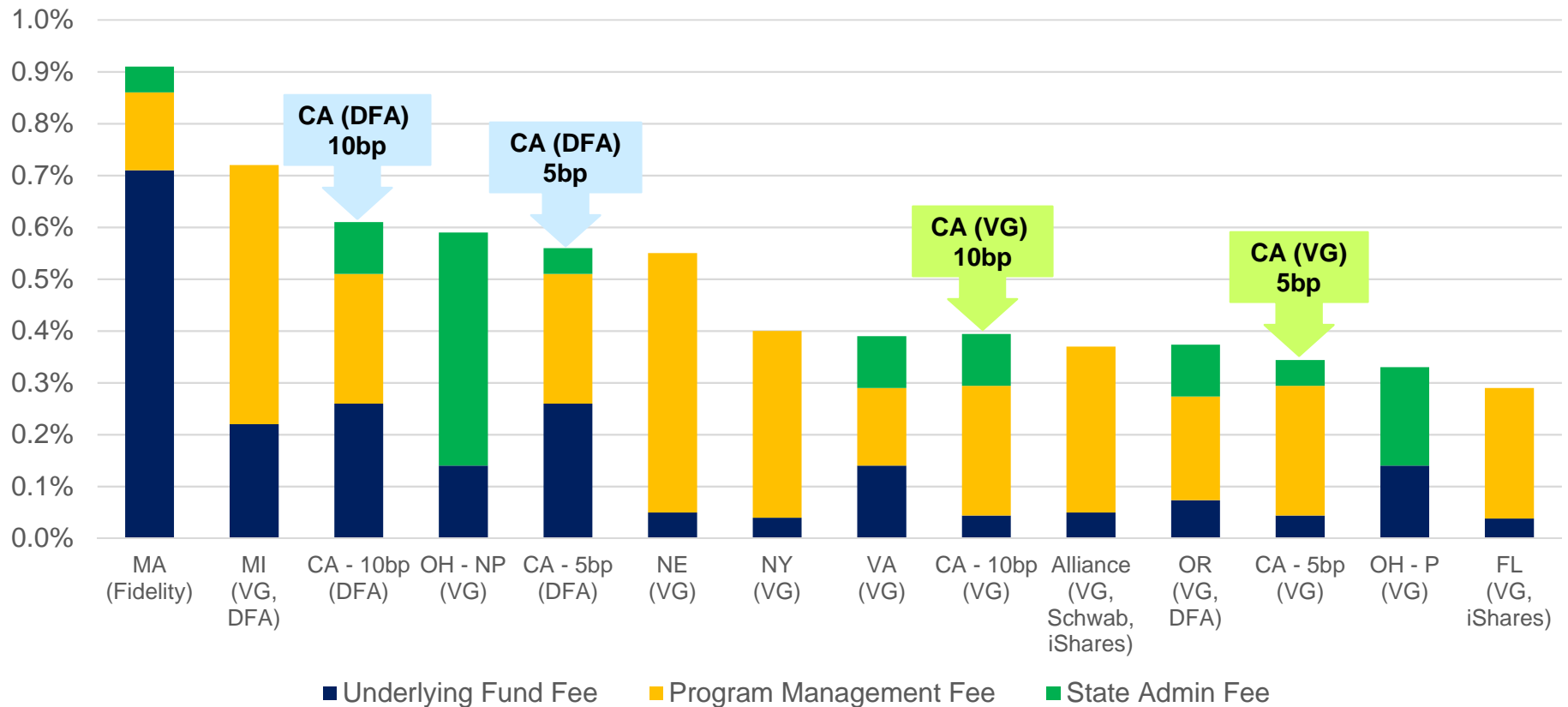


Source: Program Disclosure Statements available as of August 23, 2017.

Notes: (i) Does not include Louisiana and Tennessee. (ii) Florida State Administrative Fee is assumed to be 0%. (iii) (P) represents Partner States and (NP) represents Non-Partner States. (iv) New York fee represents the moderate static option. (v) California fees represent the DFA and VG static options. (vi) Florida fee represents the moderate static option.

Example: Asset-Based Total Fee Comparison

60/40 Static Allocation Portfolio



Source: Program Disclosure Statements available as of August 23, 2017.

Notes: (i) Does not include Louisiana and Tennessee. (ii) Used 50/50 static allocation portfolio for Oregon because 60/40 is not offered. (iii) Florida State Administrative Fee is assumed to be 0%. (iv) (P) represents Partner States and (NP) represents Non-Partner States. (v) CA (VG) portfolios are domestic 60%/40% static allocation portfolios created from the VG Total Stock Market Index and VG Total Bond Market Index individual options proposed by Nottingham.

Dollar-Based Annual Account Maintenance Fees

Plan		Residents	Non-Residents	Fee Recipient
National ABLÉ Alliance		\$55-60	\$60	State
Partnerships	NE	\$45	same	Unclear
	OH	\$30	\$42 ¹	Intuition
Independent	CA	\$36 ²	\$36 ²	Nottingham ³
	FL	\$30	--	--
	LA	--	--	--
	MA	\$30	\$30	Fidelity
	MI	\$45	\$45	Unclear
	NY	\$55	Same	--
	OR	\$22.50 - through 2017 \$45 - beyond 2017	\$35	Unclear
	TN	--	--	--
	VA	\$39	\$39	Appears to go to State

Source: Program Disclosure Statements available as of August 23, 2017

¹ Non-Ohio residents pay \$3.50 monthly regardless of whether their State of residency is a Partner State

² Assumes 10,000 accounts, which equates to \$3 monthly based on Nottingham's response

³ \$10 p/account onboarding fee also proposed

Hypothetical Fee Comparisons: Year 1

State Plan Investment Option (60/40 static)	California Dimensional 2030	California Vanguard Domestic ¹	Illinois Growth	Ohio Moderate Growth	Oregon Moderate ²
Assumed Assets ³	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000
Asset-based Fee (bp)	0.61% ⁴	0.39% ⁴	0.37%	0.33%	0.37%
Asset-based Fee (\$)	\$18.30	\$11.70	\$11.10	\$9.90	\$11.10
Year 1 Onboarding Fee (\$)	\$10.00	\$10.00	--	--	--
Account Maintenance Fee (\$)	\$36.00 ⁵	\$36.00 ⁵	\$60.00 ⁶	\$42.00 ⁶	\$35.00 ⁶
Total Annual Fees	\$64.30	\$57.70	\$71.10	\$51.90	\$46.10
Basis Point Equivalent	2.14%	1.92%	2.37%	1.73%	1.54%

Source: Program Disclosure Statements available as of August 23, 2017

Notes: (1) CA Vanguard Domestic portfolio is a domestic 60%/40% static allocation portfolio created from the VG Total Stock Market Index and VG Total Bond Market Index individual options proposed by Nottingham. (2) Used 50/50 static allocation portfolio because 60/40 is not offered. (3) Assumes assets remain constant over time. (4) Includes 10bp state admin fee. (5) Annual maintenance fee assumes up to 10,000 accounts. (6) Nonresident account maintenance fees.

Hypothetical Fee Comparisons: Year 2 and Beyond

State Plan Investment Option (60/40 static)	California Dimensional 2030	California Vanguard Domestic ¹	Illinois Growth	Ohio Moderate Growth	Oregon Moderate ²
Assumed Assets³	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000
Asset-based Fee (bp)	0.61% ⁴	0.39% ⁴	0.37%	0.33%	0.37%
Asset-based Fee (\$)	\$18.30	\$11.70	\$11.10	\$9.90	\$11.10
Year 1 Onboarding Fee (\$)	--	--	--	--	--
Account Maintenance Fee (\$)	\$36.00 ⁵	\$36.00 ⁵	\$60.00 ⁶	\$42.00 ⁶	\$35.00 ⁶
Total Annual Fees	\$54.30	\$47.70	\$71.10	\$51.90	\$46.10
Basis Point Equivalent	1.81%	1.59%	2.37%	1.73%	1.54%

Source: Program Disclosure Statements available as of August 23, 2017

Notes: See page 18

Hypothetical Fee Comparisons: Five-Year Fees

State Plan Investment Option (60/40 static)	California Dimensional 2030	California Vanguard Domestic ¹	Illinois Growth	Ohio Moderate Growth	Oregon Moderate ²
Assumed Assets³	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000
Total Annual Fees – Year 1^{4,5,6}	\$64.30	\$57.70	\$71.10	\$51.90	\$46.10
Total Annual Fees – Years 2 +^{4,5,6}	\$54.30	\$47.70	\$71.10	\$51.90	\$46.10
Total Five-Year Fees	\$281.50	\$248.50	\$355.50	\$259.50	\$230.50
Basis Point Equivalent	9.38%	8.28%	11.85%	8.65%	7.68%

Source: Program Disclosure Statements available as of August 23, 2017

Notes: See page 18

Appendix

Asset-Based Fees: Sorted by Program Structure

Plan		Underlying Fund	Program Management	State Admin	Total Fee
National ABLE Alliance		0.02 - 0.06%	0.32%	None	0.34 - 0.38%
Partnerships	NE	0 - 0.06%	0.50%	None	0.50 - 0.56%
	OH	0 - 0.15%	None	0.19% (P) 0.45% (NP)	0.19 - 0.34% (P) 0.45 - 0.60% (NP)
Independent	CA	0.04 - 0.12% VG 0.23 - 0.53% DFA 0.07 - 1.40% Other	0.05 - 0.25%	0.05 - 0.10%	0.39 - 0.47% VG* 0.58 - 0.88% DFA* 0.315 - 1.75% Other*
	FL	Not specified	Not specified	Not specified	0.035 - 0.29%
	MA	0.37 - 0.74%	0.15%	0.05%	0.57 - 0.94%
	MI	0 - 0.28%	0.50%	None	0.50 - 0.78%
	NY	0.02 - 0.04%	0.36 - 0.38%	Included, if any	0.40%
	OR	0.0647 - 0.081%	0.20%	0.10%	0.30 - 0.381%
	TN	0 - 0.64%	None	0 - 0.31%	0 - 0.64%
	VA	0.12 - 0.15%	0.15%	0.10%	0 - 0.40%

Source: Program Disclosure Statements available as of August 23, 2017. Does not include Louisiana

(P) represents Partner States; (NP) represents Non-Partner States

* Reflects 0.10% State Administrative Fee. Using 0.05% State Administrative Fee, Total Fee would be 0.34-0.42% (VG), 0.53-0.83% (DFA) and 26.5-1.70% (Other)

Asset-Based Total Fees

Plan	Total Fee
California - Other	0.315 - 1.75%*
Massachusetts	0.57 - 0.94%
California - DFA	0.58 - 0.88%*
Michigan	0.50 - 0.78%
Tennessee	0 - 0.64%
OH Non-Partnership States	0.45 - 0.60%
NE Partnership	0.50 - 0.56%
California - VG	0.39 - 0.47%*
New York	0.40%
Virginia	0 - 0.40%
Oregon	0.30 - 0.381%
National ABLE Alliance	0.34 - 0.38%
OH Partnership States	0.19 - 0.34%
Florida	0.035 - 0.29%

Source: Program Disclosure Statements available as of August 23, 2017. Does not include Louisiana

* Reflects 0.10% State Administrative Fee. Using 0.05% State Administrative Fee, Total Fee would be 0.34-0.42% (VG), 0.53-0.83% (DFA) and 26.5-1.70% (Other)