

**STATE OF FLORIDA
STATE BOARD OF ADMINISTRATION
LOCAL GOVERNMENT SURPLUS
FUNDS TRUST FUND
(FLORIDA PRIME)**

(An External Investment Pool)

For the Fiscal Years Ended
June 30, 2024, and June 30, 2023



Sherrill F. Norman, CPA
Auditor General

Board of Trustees and Executive Director of the State Board of Administration

Article IV, Section 4(e) of the State Constitution (1968), as amended, establishes the State Board of Administration. The SBA Board of Trustees is composed of the Governor, as Chair, the Chief Financial Officer, and the Attorney General. The Trustees delegate administrative and investment authority to an appointed Executive Director. During the audit period, Mr. Lamar Taylor served as Interim Executive Director through June 16, 2024, and Mr. Chris Spencer served as Executive Director thereafter.

The Auditor General conducts audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

The team leader was Ranleigh Hudgens, CPA, and the audit was supervised by Joshua T. Barrett, CPA.

Please address inquiries regarding this report to Joshua T. Barrett, CPA, Audit Manager, by e-mail at joshuabarrett@aud.state.fl.us or by telephone at (850) 412-2804.

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STATE BOARD OF ADMINISTRATION
LOCAL GOVERNMENT SURPLUS FUNDS TRUST FUND (FLORIDA PRIME)
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SUMMARY

SUMMARY OF REPORT ON FINANCIAL STATEMENTS

Our audit disclosed that the basic financial statements prepared by the State Board of Administration (SBA) presented fairly, in all material respects, the net position of the Local Government Surplus Funds Trust Fund (Florida PRIME) and the changes in net position thereof in accordance with prescribed financial reporting standards.

SUMMARY OF REPORT ON INTERNAL CONTROL AND COMPLIANCE

Our audit did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses.

The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* issued by the Comptroller General of the United States.

AUDIT OBJECTIVES AND SCOPE

Our audit objectives were to obtain reasonable assurance about whether the financial statements as a whole were free from material misstatements, whether due to fraud or error, and to issue an auditor's report that included our opinions. In doing so we:

- Exercised professional judgment and maintained professional skepticism throughout the audit.
- Identified and assessed the risks of material misstatement of the financial statements, whether due to error or fraud, and designed and performed audit procedures responsive to those risks.
- Obtained an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of SBA's internal control.
- Evaluated the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluated the overall presentation of the financial statements.
- Concluded whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about Florida PRIME's ability to continue as a going concern for a reasonable period of time.
- Examined various transactions to determine whether they were executed, in both manner and substance, in accordance with governing provisions of laws, rules, regulations, contracts, and Florida PRIME's investment policy.

The scope of this audit included an examination of Florida PRIME's basic financial statements as of and for the fiscal years ended June 30, 2024, and June 30, 2023.

AUDIT METHODOLOGY

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.



Sherrill F. Norman, CPA
Auditor General

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The President of the Senate, the Speaker of the
House of Representatives, and the
Legislative Auditing Committee

INDEPENDENT AUDITOR'S REPORT

Report on the Audit of the Financial Statements

Opinions

We have audited the financial statements of the State Board of Administration (SBA) Local Government Surplus Funds Trust Fund (Florida PRIME), as of and for the fiscal years ended June 30, 2024, and June 30, 2023, and the related notes to the financial statements, which collectively comprise Florida PRIME's basic financial statements as listed in the table of contents.

In our opinion, the accompanying financial statements referred to above present fairly, in all material respects, the respective financial position of Florida PRIME, as of June 30, 2024, and June 30, 2023, and the respective changes in financial position thereof for the fiscal years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the ***Auditor's Responsibilities for the Audit of the Financial Statements*** section of our report. We are required to be independent of Florida PRIME and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Emphasis of Matter

As discussed in Note I.A., the financial statements present only Florida PRIME and do not purport to, and do not, present fairly the financial position of the State of Florida as of June 30, 2024, and June 30, 2023, or the changes in its financial position for the years then ended in accordance with accounting principles

generally accepted in the United States of America. Our opinions are not modified with respect to this matter.

Responsibilities of Management for the Financial Statements

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

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Florida PRIME's ability to continue as a going concern for 12 months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

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

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of Florida PRIME's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about Florida PRIME's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that **MANAGEMENT'S DISCUSSION AND ANALYSIS** on pages 5 through 9 be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with GAAS, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 13, 2024, on our consideration of the SBA's internal control over financial reporting relating to Florida PRIME and on our tests of its compliance with certain provisions of laws, rules, regulations, contracts, and other matters included under the heading **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**. 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 SBA'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 SBA's internal control over financial reporting and compliance.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
December 13, 2024

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MANAGEMENT'S DISCUSSION AND ANALYSIS

YEARS ENDED JUNE 30, 2024, AND JUNE 30, 2023

The State Board of Administration (SBA) is responsible for the management of the Local Government Surplus Funds Trust Fund (Florida PRIME).¹ The SBA was established on June 21, 1929, pursuant to Chapter 14486, Laws of Florida (1929). The SBA was subsequently created as a constitutional body corporate on January 1, 1943, by Article IX, Section 16 of the State Constitution of 1885, as amended, and was continued as a body corporate by Article IV, Section 4(e) of the State Constitution (1968), as amended. The SBA is governed by the Governor, as Chair, the Chief Financial Officer, and the Attorney General.

As management of the SBA, we offer readers of Florida PRIME's financial statements this overview and analysis of Florida PRIME's financial results and position for the fiscal years ended June 30, 2024, and 2023. We encourage readers to consider the information presented here in conjunction with the financial statements and notes to the financial statements, which begin on page 10.

OVERVIEW OF FINANCIAL STATEMENTS

The financial statements provide financial information about Florida PRIME as an investment trust fund, a fiduciary fund type. Investment trust funds are accounted for using an economic resources measurement focus and the accrual basis of accounting. Earnings on investments are recognized as revenue when earned, and expenses are recorded when a liability is incurred.

The SBA presents the following Florida PRIME basic financial statements: Statements of Net Position and Statements of Changes in Net Position. The Statements of Net Position present information about the nature and amounts of Florida PRIME's assets and liabilities, with the difference reported as net position. The Statements of Changes in Net Position report the increase or decrease in net position during the year as a result of investment activities and participant contributions and withdrawals.

FINANCIAL SUMMARY

The following Condensed Statements of Net Position and Condensed Statements of Changes in Net Position summarize Florida PRIME's financial statements for each of the last three fiscal years.

¹ Since August 2009, the SBA has used the name "Florida PRIME" to refer to the Local Government Surplus Funds Trust Fund.

Condensed Statements of Net Position

(In Thousands)

	As of June 30,		
	2024	2023	2022
Total assets	\$ 25,514,236	\$ 21,502,753	\$ 18,746,343
Total liabilities	29,751	33,369	56,175
Net position	\$ 25,484,485	\$ 21,469,384	\$ 18,690,168

Condensed Statements of Changes in Net Position

(In Thousands)

	For the Fiscal Year Ended June 30,		
	2024	2023	2022
Changes in net position:			
Investment income	\$ 1,358,201	\$ 859,808	\$ 66,266
Investment expenses	(7,880)	(6,563)	(5,778)
Net income from investing activity	1,350,321	853,245	60,488
Settlements	13	-	95
Distributions paid and payable	(1,350,334)	(853,245)	(60,583)
Participant contributions	39,526,694	35,767,006	30,022,697
Reinvested distributions	1,350,392	853,213	60,546
Participant withdrawals	(36,861,985)	(33,841,003)	(28,834,773)
Changes in net position	4,015,101	2,779,216	1,248,470
Net position, July 1	21,469,384	18,690,168	17,441,698
Net position, June 30	\$ 25,484,485	\$ 21,469,384	\$ 18,690,168

FINANCIAL ANALYSIS

Assets

Total assets at the end of fiscal years 2024, 2023, and 2022 were \$25.5 billion, \$21.5 billion, and \$18.7 billion, respectively. The increase in total assets and net position in fiscal year 2024 was due primarily to participant contributions exceeding withdrawals by \$2.7 billion, while net income from investing activity added another \$1.4 billion. The increase in total assets and net position during fiscal year 2023 was mainly the result of participant contributions exceeding withdrawals by \$1.9 billion, while net income from investing activity added another \$853.2 million.

Liabilities

Total liabilities at the end of fiscal years 2024, 2023, and 2022 were \$29.8 million, \$33.4 million, and \$56.2 million, respectively. Liabilities decreased by \$3.6 million in fiscal year 2024 following a decrease of \$22.8 million in fiscal year 2023. The decrease in fiscal year 2024 was due to a decrease in a cash overdraft payable of \$6.3 million due to non-receipt of a registered deposit, offset by a \$2.3 million increase in unregistered deposits (deposits sent without prior notification to the SBA) and a \$413 thousand increase in other liabilities. Deposits sent in without being registered by participants are

recorded as liabilities until the depositor is identified and credit is awarded to the participant. The decrease in fiscal year 2023 was due to a \$44.9 million decrease in pending investment purchases, plus a decrease in a cash overdraft payable of \$3.6 million due to non-receipt of a registered deposit, offset by a \$25.5 million increase in unregistered deposits, and a \$195 thousand increase to other liabilities.

Net Position and Changes in Net Position

Florida PRIME's net position increased by \$4.0 billion (19 percent) to \$25.5 billion at June 30, 2024, from \$21.5 billion at June 30, 2023, following a \$2.8 billion (15 percent) increase in the previous fiscal year from \$18.7 billion.

Net income from investing activity of \$1.35 billion for the fiscal year ended June 30, 2024, was \$497.1 million higher than the \$853.2 million earned for fiscal year 2023, due to higher average participant balances and higher investment yields throughout the fiscal year. Net income from investing activity for fiscal year 2023 was \$792.7 million higher than the \$60.5 million earned for fiscal year 2022, due to higher average participant balances and significantly higher investment yields throughout the fiscal year.

Effective July 27, 2023, the Federal Reserve raised their target interest rate range to 5.25 to 5.5 percent, making it the highest level in more than 22 years. Rates were held steady throughout the rest of the fiscal year, as the Fed initiated a wait and see approach to the movement of inflation. The inflation rate for the twelve months ended June 30, 2024, was at 3.0 percent according to U.S. Department of Labor data published on July 11, 2024.

During fiscal year 2023, higher inflation persisted, with the inflation rate for the twelve months ended June 30, 2023, at 3.0 percent according to U.S. Labor Department data published on July 12, 2023. Although this was a two-year low, prices remained high after the 9.1 percent inflation rate from the previous year. This persistent inflation, among other factors, led the Fed to increase their target interest rate range by 0.75 percent three separate times in July, September, and early November 2022, before slowing down to a 0.50 percent increase in December 2022. In February, and again in March and May 2023, the Fed continued raising their target interest rate range but at a slower pace with 0.25 percent increases each time to end the fiscal year at 5.00 to 5.25 percent.

Total investment expenses of \$7.9 million increased approximately \$1.3 million during fiscal year 2024, due to an increase in investment management fees, SBA service charges, and bank fees and overdraft charges of \$785 thousand, \$337 thousand, and \$191 thousand, respectively. Investment expenses increased approximately \$785 thousand during fiscal year 2023 over 2022 because of an increase in investment management fees, SBA service charges, and bank fees and overdraft charges of \$411 thousand, \$267 thousand, and \$107 thousand, respectively. The increases in both fiscal years 2024 and 2023 were primarily due to higher average daily participant balances during the fiscal years. Total investment expenses in fiscal years 2024 and 2023 were 3.2 basis points and 3.1 basis points, respectively, or 0.032 and 0.031 percent of average assets under management.

FINANCIAL HIGHLIGHTS

Florida PRIME is governed by Chapters 215 and 218, Florida Statutes, and SBA Rules, Chapter 19-7, Florida Administrative Code. The purpose of Chapter 218, Part IV, Florida Statutes, is to promote, through State assistance, the maximization of net interest earnings on invested surplus funds of units of local government, based on the principles of investor protection, mandated transparency, and proper governance, with the goal of reducing the need for imposing additional taxes. The primary investment objectives, in priority order, are safety, liquidity, and competitive returns with minimization of risks.

Units of local government eligible to participate in Florida PRIME include, but are not limited to, any county, municipality, school district, special district, clerk of the circuit court, sheriff, property appraiser, tax collector, supervisor of elections, State university, State college, community college, authority, board, public corporation, or any other political subdivision.

For the fiscal year ended June 30, 2024:

- Participant contributions increased 10.5 percent compared to the prior fiscal year, while participant withdrawals increased 8.9 percent. Total contributions exceeded total distributions for the period, resulting in net contributions of \$2.7 billion.
- Net income from investing activity increased \$497.1 million from the prior fiscal year, resulting in an average participant yield for the fiscal year of 5.7 percent, which was higher than the average participant yield of 4.05 percent for the prior fiscal year. The increase in net income from investing activity was due to higher average participant balances throughout the fiscal year and to the Fed raising the target range for the Federal Funds interest rate by 0.25 percent early in the fiscal year. This increase, effective July 27, 2023, raised the range to 5.25 to 5.50 percent. The target range remained at this level through June 30, 2024.
- The number of active participants increased from 770 to 809.

For the fiscal year ended June 30, 2023:

- Participant contributions increased 19.1 percent compared to the prior fiscal year, while participant withdrawals increased 17.4 percent. Total contributions exceeded total distributions for the period, resulting in net contributions of \$1.9 billion.
- Net income from investing activity increased \$792.7 million from the prior fiscal year, resulting in an average participant yield for the fiscal year of 4.05 percent, which was much higher than the average participant yield of 0.32 percent for the prior fiscal year. The increase in net income from investing activity was due to higher average participant balances throughout the fiscal year and to the Fed raising the target range for the Federal Funds interest rate multiple times during the fiscal year. The first increase on July 28, 2022, raised the rate to 2.25 to 2.50 percent, followed by six additional increases culminating with the latest increase to 5.00 to 5.25 percent on May 4, 2023.
- The number of active participants increased from 745 to 770.

CONTACT INFORMATION

These financial statements reflect only the transactions and balances for Florida PRIME. For additional information on Florida PRIME, please contact the State Board of Administration, Chief Financial Officer, 1801 Hermitage Boulevard, Suite 100, Tallahassee, Florida 32308 or visit SBA's website at <https://prime.sbafla.com>

BASIC FINANCIAL STATEMENTS

**State Board of Administration
Local Government Surplus Funds Trust Fund (Florida PRIME)
Statements of Net Position**

As of June 30, 2024, and June 30, 2023

(In Thousands)

	<u>June 30, 2024</u>	<u>June 30, 2023</u>
ASSETS		
Cash and cash equivalents	\$ 5,539,453	\$ 4,180,000
Investments:		
Certificates of deposit	5,401,573	4,935,500
Commercial paper	12,266,096	10,536,483
Money market funds	3,251	636,694
Repurchase agreements	1,563,000	774,000
Domestic corporate bonds and notes	590,078	363,380
Municipal bonds and notes	44,420	14,850
Total investments	<u>19,868,418</u>	<u>17,260,907</u>
Interest receivable	106,338	61,817
Prepaid fees	25	24
Undistributed expenses	2	5
Total Assets	<u>25,514,236</u>	<u>21,502,753</u>
LIABILITIES		
Accounts payable and accrued liabilities	1,750	7,648
Due to local governments	27,924	25,583
Distributions payable	77	138
Total Liabilities	<u>29,751</u>	<u>33,369</u>
NET POSITION		
Held in trust for pool participants	<u>\$ 25,484,485</u>	<u>\$ 21,469,384</u>

The accompanying notes to financial statements are an integral part of this statement.

**State Board of Administration
Local Government Surplus Funds Trust Fund (Florida PRIME)
Statements of Changes in Net Position**

Years Ended June 30, 2024, and June 30, 2023

(In Thousands)

	<u>June 30, 2024</u>	<u>June 30, 2023</u>
ADDITIONS		
Income from investing activity:		
Investment income	\$ 1,358,201	\$ 859,808
Investment expenses:		
Investment management fees	(4,771)	(3,986)
Administrative service charges	(2,429)	(2,092)
Bank fees	(408)	(327)
Bank overdraft charges	(163)	(53)
Compliance review fees	(60)	(57)
Standard and Poor's rating maintenance fees	(49)	(48)
Investment expenses	<u>(7,880)</u>	<u>(6,563)</u>
Net income from investing activity	<u>1,350,321</u>	<u>853,245</u>
Settlements	<u>13</u>	<u>-</u>
Total Additions	<u>1,350,334</u>	<u>853,245</u>
 DEDUCTIONS		
Distributions paid and payable	<u>1,350,334</u>	<u>853,245</u>
Total Deductions	<u>1,350,334</u>	<u>853,245</u>
 SHARE TRANSACTIONS		
Participant contributions	39,526,694	35,767,006
Reinvested distributions	1,350,392	853,213
Participant withdrawals	<u>(36,861,985)</u>	<u>(33,841,003)</u>
Net Increase (Decrease) Resulting from Share Transactions	<u>4,015,101</u>	<u>2,779,216</u>
Increase (decrease) in net position	<u>4,015,101</u>	<u>2,779,216</u>
Net position, beginning of year	<u>21,469,384</u>	<u>18,690,168</u>
Net position, end of year	<u>\$ 25,484,485</u>	<u>\$ 21,469,384</u>

The accompanying notes to financial statements are an integral part of this statement.

NOTES TO FINANCIAL STATEMENTS

I. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The following summary of the significant accounting policies of the Local Government Surplus Funds Trust Fund (Florida PRIME) is presented to assist the reader in interpreting the financial statements. These policies should be viewed as an integral part of the accompanying financial statements.

A. Reporting Entity

The State Board of Administration (SBA) is responsible for the management of Florida PRIME. The SBA was established on June 21, 1929, pursuant to Chapter 14486, Laws of Florida (1929). The SBA was subsequently created as a constitutional body corporate on January 1, 1943, by Article IX, Section 16 of the State Constitution of 1885, as amended. The SBA was subsequently continued as a body corporate by Article IV, Section 4(e) of the State Constitution (1968), as amended. The SBA is composed of the Governor, as Chair, the Chief Financial Officer, and the Attorney General.

The Local Government Surplus Funds Trust Fund was created by act of the Florida Legislature effective October 1, 1977, (Chapter 218, Part IV, Florida Statutes). The law allowed the SBA to manage investments on an individual basis or to establish a pooled account. The funds were managed on an individual basis until January 1, 1982. On August 3, 2009, the SBA began using "Florida PRIME" when referring to the Local Government Surplus Funds Trust Fund.

Sections 218.40 through 218.415, Florida Statutes, and SBA Rules 19-7.002 through 19-7.016, Florida Administrative Code, promulgated pursuant to Section 218.405(4), Florida Statutes, govern the operation of Florida PRIME.

The assets and liabilities of Florida PRIME are included in the Annual Comprehensive Financial Report of the State of Florida. The accompanying financial statements present only Florida PRIME and are not intended to present fairly the financial position of the State of Florida and the results of its operations in conformity with generally accepted accounting principles.

B. Regulatory Oversight

Securities and Exchange Commission (SEC) Rule 2a-7 sets out certain requirements pertaining to money market funds required to register with the SEC under the Investment Company Act of 1940. Florida PRIME is not required to register (and has not registered) with the SEC; however, the fund is an external investment pool that has historically adopted operating procedures consistent with those required by SEC Rule 2a-7, which was significantly amended in 2014. In December 2015, the Governmental Accounting Standards Board (GASB) issued Statement No. 79, *Certain External Investment Pools and Pool Participants*, as codified in Section In5, *Investment Pools (External)*, which addresses for certain external investment pools like Florida PRIME and their participants, the accounting and financial reporting implications that result from the SEC Rule 2a-7 amendments.

GASB Codification Section In5 allows an external investment pool for financial reporting purposes to elect to measure all its investments at amortized cost if the pool meets certain criteria such as portfolio maturity, quality, diversification, and liquidity requirements, and transacts with its participants at a stable net asset value per share. Florida PRIME will seek to operate in a manner consistent with the

criteria and requirements of GASB Codification Section In5. Consequently, the SBA has elected to measure for financial reporting purposes all of Florida PRIME’s investments at amortized cost.

C. Basis of Presentation

These financial statements have been prepared in accordance with generally accepted accounting principles (GAAP). The GASB is the accepted standard-setting body for establishing governmental accounting and reporting principles.

Florida PRIME is reported as an investment trust fund, a fiduciary fund type.

D. Measurement Focus and Basis of Accounting

Basis of accounting refers to when revenues and expenses and the related assets and liabilities are recognized in the accounts and reported in the financial statements. Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied. The accompanying financial statements were prepared using the economic resources measurement focus and the accrual basis of accounting in accordance with GAAP. Under this method, earnings on investments, including interest income, are recognized as revenue when earned, and expenses are recognized when a liability is incurred.

E. Cash and Cash Equivalents

Florida PRIME reports as “Cash and cash equivalents” all cash on hand and on deposit in banks, including demand deposits, time deposits, and non-negotiable certificates of deposit.

F. Investments

Florida PRIME’s investments are reported at amortized cost, consistent with GASB Codification Section In5. Fair values, for note disclosures, are calculated using quoted market prices. If quoted market prices are not readily available, alternative pricing methodologies may include the use of discounted cash flow models, broker bids, matrix-pricing, or cost/book value.

G. Method Used to Determine Participants’ Shares Sold and Redeemed

Participants’ shares are sold and redeemed in Florida PRIME at a stable net asset value per share and earnings are allocated at month-end using the amortized cost method, which is consistent with the method used to report Florida PRIME’s investments. The amortized cost method calculates an investment’s value by adjusting its acquisition cost for the accretion of discount or amortization of premium over the period from purchase to maturity.

H. Legally Binding Guarantees

The SBA has not provided or obtained any legally binding guarantees during the fiscal years ended June 30, 2024, and June 30, 2023, for Florida PRIME.

I. Involuntary Participation

There is no requirement under Florida Statutes for any local government or State agency to participate in Florida PRIME.

J. Frequency of Determining Fair Value of Shares

The fair value of the investments of Florida PRIME is determined daily by the custodian bank. Florida PRIME's Investment Policy Statement provides that the custodian will, on a daily basis, mark to market the portfolio holdings of Florida PRIME and communicate both the amortized cost price and the market price to the SBA and the investment manager. The Investment Policy Statement also provides that the investment manager performs daily compliance monitoring of the amortized cost price and market price. The SBA performs periodic oversight, at least monthly, of the investment manager's compliance monitoring. When the deviation between the fair value and amortized cost of Florida PRIME exceeds 0.50 percent, the Investment Policy Statement provides that the Executive Director of the SBA is to promptly consider what action, if any, should be initiated. When the Executive Director believes that the extent of any deviation from Florida PRIME's amortized cost price per share may result in material dilution or other unfair results to investors or existing shareholders, the Executive Director will cause Florida PRIME to take such action as deemed appropriate to eliminate or reduce to the extent reasonably practicable such dilution or unfair results. For the fiscal years ended June 30, 2024, and June 30, 2023, the ratio of fair value to amortized cost was 99.99 percent.

K. Limitations on Participant Contributions and Withdrawals

Florida PRIME currently has in place no limitations or restrictions on participant withdrawals, does not currently charge liquidity fees, and has not put in place a redemption gate. Each participant has the ability to withdraw 100 percent of its account balance any day Florida PRIME is open for business.

However, with respect to redemption gates, Section 218.409(8)(a), Florida Statutes, provides that the Executive Director may, in good faith, on the occurrence of an event that has a material impact on liquidity or operations of Florida PRIME, for 48 hours limit contributions to or withdrawals from Florida PRIME to ensure that the SBA can invest moneys entrusted to it in exercising its fiduciary responsibility. Such action must be immediately disclosed to all participants, the trustees, the Joint Legislative Auditing Committee, and the Investment Advisory Council. The trustees shall convene an emergency meeting as soon as practicable from the time the Executive Director has instituted such measures and review the necessity of those measures. If the trustees are unable to convene an emergency meeting before the expiration of the 48-hour moratorium on contributions and withdrawals, the Executive Director may extend the moratorium until the trustees are able to meet to review the necessity for the moratorium. If the trustees agree with such measures, the trustees shall vote to continue the measures for up to an additional 15 days. The trustees must convene and vote to continue any such measures before the expiration of the time limit set, but in no case may the time limit set by the trustees exceed 15 days.

With respect to liquidity fees, Section 218.409(4), Florida Statutes, provides authority for the SBA to impose penalties for early withdrawal, subject to disclosure in the enrollment materials for Florida PRIME of the amount and purpose of such fees. At present, no such disclosure has been made or deemed necessary, as Florida PRIME does not charge liquidity fees.

L. Fees and Administrative Service Charges

Federated Hermes (Federated) is the investment manager for Florida PRIME. Federated charges the SBA an annual investment management fee based on the average daily net assets (i.e., average daily amortized cost) of Florida PRIME (excluding Federated money market fund balances), as follows:

First \$1 billion in Account Assets	3.5 basis points
Next \$1.5 billion in Account Assets	3.0 basis points
Next \$2.5 billion in Account Assets	2.5 basis points
Balance of Account Assets over \$5 billion	2.0 basis points

In accordance with SBA Rule 19-3.016(17), Florida Administrative Code, the SBA charges participants an administrative service charge to recover its costs related to operating Florida PRIME. Currently, the SBA service charge is 1.0 basis point (.0001) on total Florida PRIME assets.

Florida PRIME also incurs various bank fees (including transaction and overdraft charges), custody fees, performance analytics, credit rating maintenance, and compliance review fees. The compliance review fees resulted from the provisions of Section 218.405(3), Florida Statutes, which require that the trustees annually certify to the Joint Legislative Auditing Committee that Florida PRIME is in compliance with State law.

All fees and charges are taken out of the monthly earnings prior to the distribution of net earnings to participant balances each month.

M. New Accounting Standards

GASB Statements No. 99, *Omnibus 2022*, paragraphs 4-7 and 8-10, became effective for the fiscal year ended June 30, 2024. Florida PRIME's statements of net position and statements of changes in net position are not affected by the adoption of the applicable GASB provisions, as Florida PRIME did not invest in derivative instruments and did not extend any exchange or exchange-like financial guarantees for the fiscal year ended June 30, 2024.

II. DEPOSITS AND INVESTMENTS

A. Deposits

Florida PRIME holds cash in deposit accounts at various financial institutions. These deposits totaled \$5.5 billion on June 30, 2024, and \$4.2 billion on June 30, 2023. Chapter 280, Florida Statutes, generally requires public funds to be deposited in a bank or savings association designated by the State of Florida Chief Financial Officer (State CFO) as a qualified public depository (QPD).

The State CFO determines the collateral requirements and collateral pledging level for each QPD following guidelines outlined in Department of Financial Services Rules, Chapter 69C-2, Florida Administrative Code, and Section 280.04, Florida Statutes. Eligible collateral includes Federal, federally guaranteed, state and local government obligations; corporate bonds; and letters of credit issued by a Federal Home Loan Bank. Other collateral may be eligible, with the State CFO's permission.

At June 30, 2024, Florida PRIME held seven time deposits totaling \$5.5 billion that were exposed to custodial credit risk because they were uninsured and uncollateralized. Under the investment policy for Florida PRIME, the investment manager is allowed to invest in unsecured interest-bearing deposits with banks if they have capital, surplus, and undivided profits of over \$100,000,000, or if the Deposit Insurance Fund, which is administered by the Federal Deposit Insurance Corporation, insures the principal amount of the instrument. All time deposits were held in banks that met the \$100,000,000 requirement for capital, surplus, and undivided profits. All other deposits held in Florida PRIME totaled \$24.5 million and were covered by Federal deposit insurance or the State's collateral pool pursuant to Chapter 280, Florida Statutes.

GASB Codification Section In5 requires that deposits should either (1) be held by a depository institution with a credit rating within the highest category of short-term credit ratings (or its long-term equivalent category) or determined (based upon the qualifying external investment pool's analysis) to be of comparable quality, or (2) be insured or collateralized such that it is not exposed to custodial credit risk. The depositories holding the time deposits at June 30, 2024, met the first criteria.

At June 30, 2023, depositories holding the \$4.2 billion in time deposits met the first criteria specified above. Florida PRIME held no other deposits on June 30, 2023.

B. Investment Authority and Compliance

The SBA has the authority to administer and invest the funds of Florida PRIME in accordance with Chapter 218, Part IV, Florida Statutes. The statute states the SBA shall invest the moneys of Florida PRIME in the same manner and subject to the same restrictions as are set forth in Section 215.47, Florida Statutes, which identifies all authorized securities.

Section 215.47, Florida Statutes, includes a broad range of instruments to enable the SBA to administer its varied investment responsibilities. The Investment Policy Statement for Florida PRIME lists the following authorized principal investments:

- United States (U.S.) Treasury obligations.
- U.S. Government Agency obligations.
- Government securities, which are defined as any security issued or guaranteed as to principal or interest by the United States, or by a person controlled or supervised by and acting as an instrumentality of the Government of the United States pursuant to authority granted by the Congress of the United States; or any certificate of deposit for any of the foregoing.
- Insurance contracts, including guaranteed investment contracts, funding agreements, and annuities.
- Corporate debt securities, such as notes, bonds, debentures, commercial paper, interests in bank loans to companies, and demand instruments.
- Bank instruments (including Yankee and Eurodollar), such as bank accounts, time deposits, certificates of deposit, and bankers' acceptances. Yankee instruments are denominated in U.S. dollars and issued by U.S. branches of foreign banks. Eurodollar instruments are denominated in U.S. dollars and issued by non-U.S. branches of U.S. or foreign banks.
- Asset-backed securities, which may be in the form of commercial paper, notes, or pass-through certificates.

- Municipal securities issued by states, counties, cities, and other political subdivisions and authorities.
- Foreign securities (i.e., U.S. dollar-denominated securities of issuers based outside the U.S.).
- Mortgage-backed securities representing interests in pools of mortgages. Mortgages may have fixed or adjustable interest rates.
- Private placements of securities – The SBA has determined that Florida PRIME constitutes (i) an “accredited investor” as defined in Rule 501(a)(7) promulgated under the Securities Act of 1933, as amended (the Securities Act), as long as Florida PRIME has total assets in excess of \$5,000,000 and (ii) a “qualified purchaser” as defined in Section 2(a)(51)(A)(iv) of the Investment Company Act of 1940 (1940 Act), as long as Florida PRIME in the aggregate owns and invests on a discretionary basis not less than \$25,000,000 in investments, and (iii) a “qualified institutional buyer” as defined in Rule 144(a)(1) promulgated under the Securities Act, as long as Florida PRIME in the aggregate owns and invests on a discretionary basis at least \$100,000,000 in securities.
- Shares of registered investment companies that are money market mutual funds, including those that are affiliated with the Investment Manager, Federated.
- Special transactions, including repurchase agreements and delayed delivery transactions. Repurchase agreements are transactions in which Florida PRIME buys a security from a dealer or bank and agrees to sell the security back at a mutually agreed-upon time and price. Delayed delivery transactions, including when-issued transactions, are arrangements in which Florida PRIME buys securities for a set price, with payment and delivery of the securities scheduled for a future time but no later than seven days in the future.

The primary investment objectives for Florida PRIME, in priority order, are safety, liquidity, and competitive returns with minimization of risks. This is accomplished by structuring the portfolio consistent with the diversification, maturity, liquidity, and credit quality conditions required by GASB Codification Section In5. In buying and selling portfolio securities for Florida PRIME, the Investment Manager will comply with the conditions imposed by GASB Codification Section In5; with the requirements imposed by any nationally recognized statistical rating organization (NRSRO) that rates Florida PRIME to ensure that it maintains a AAAM rating (or the equivalent); and with the investment limitations imposed by Section 215.47, Florida Statutes.

Per the Investment Policy Statement, the SBA and the Investment Manager have an affirmative duty to immediately disclose any material impact on Florida PRIME to the participants, including, but not limited to when:

- The deviation between the fair value and amortized cost of Florida PRIME exceeds 0.25 percent, the Investment Policy Statement requires that the Investment Manager establish a formal action plan. The Investment Policy Statement also requires that the Investment Oversight Group review the formal action plan and prepare a recommendation for the Executive Director’s consideration.
- The deviation between the fair value and amortized cost of Florida PRIME exceeds 0.50 percent, the Investment Policy Statement provides that the Executive Director is to promptly consider what action, if any, will be initiated. When the Executive Director believes that the extent of any deviation from Florida PRIME’s amortized cost price per share may result in material dilution or other unfair results to investors or existing shareholders, the Executive Director will cause Florida PRIME to take such action as deemed appropriate to eliminate or reduce to the extent reasonably practicable such dilution or unfair results.

C. Summary of Investment Holdings

The following tables provide a summary of the par value or share amount, carrying value, fair value, range of interest rates, and range of maturity dates for each major investment classification as of June 30, 2024, and June 30, 2023 (expressed in thousands):

As of June 30, 2024					
Investment Type	Par	Carrying Value	Fair Value	Range of Interest Rates ⁽¹⁾	Range of Maturity Dates
Time deposits ⁽²⁾	\$ 5,515,000	\$ 5,515,000	\$ 5,515,000	5.31%-5.33%	7/1/24-7/3/24
Certificates of deposit	5,403,500	5,401,573	5,402,897	5.15%-6.05%	7/2/24-6/10/25
Commercial paper	12,363,691	12,266,096	12,262,327	4.88%-5.98%	7/1/24-6/24/25
Money market funds	3,251	3,251	3,251	5.19%	N/A ⁽³⁾
Repurchase agreements	1,563,000	1,563,000	1,563,000	5.33%	7/1/24
Domestic corporate bonds and notes	590,078	590,078	590,311	5.45%-5.91%	10/21/24-3/1/62 ⁽⁴⁾
Municipal bonds and notes	44,420	44,420	44,420	5.40%-5.74%	2/1/27-12/1/59 ⁽⁵⁾
Totals	\$ 25,482,940	\$ 25,383,418	\$ 25,381,206		

- (1) The coupon rate in effect at June 30, 2024, is reported. If a security is discounted, the purchase yield is reported. The 7-day yield as of June 30, 2024, is reported for the money market funds. The yields fluctuate daily.
- (2) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.
- (3) Money market funds do not have a specified maturity date.
- (4) Florida PRIME has 11 positions in domestic corporate bonds and notes that it may tender for 100 percent of the principal amount, plus accrued interest with a minimum of 7 days prior notification to the trustee of the bonds or notes. The maturity dates on these positions range from September 1, 2041, to March 1, 2062.
- (5) Florida PRIME has 4 positions in municipal bonds and notes that it may tender for 100 percent of the principal amount, plus accrued interest with a minimum of prior notification period to the trustee of the bonds or notes ranging from 7 to 35 days. The maturity dates on these positions range from February 1, 2027, to December 1, 2059.

As of June 30, 2023					
Investment Type	Par	Carrying Value	Fair Value	Range of Interest Rates ⁽¹⁾	Range of Maturity Dates
Time deposits ⁽²⁾	\$ 4,180,000	\$ 4,180,000	\$ 4,180,000	5.05%-5.08%	7/3/23-7/6/23
Certificates of deposit	4,935,500	4,935,500	4,935,009	4.07%-6.05%	7/5/23-7/10/24
Commercial paper	10,580,581	10,536,483	10,536,039	3.94%-5.83%	7/3/23-5/16/24
Money market funds	636,459	636,694	636,333	5.00%-5.19%	N/A ⁽³⁾
Repurchase agreements	774,000	774,000	774,000	5.06%	7/3/23
Domestic corporate bonds and notes	363,380	363,380	363,365	5.12%-5.26%	12/15/23-3/1/62 ⁽⁴⁾
Municipal bonds and notes	14,850	14,850	14,850	5.41%	2/1/27-12/1/59 ⁽⁵⁾
Totals	\$ 21,484,770	\$ 21,440,907	\$ 21,439,596		

- (1) The coupon rate in effect at June 30, 2023, is reported. If a security is discounted, the purchase yield is reported. The 7-day yield as of June 30, 2023, is reported for the money market funds. The yields fluctuate daily.
- (2) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.
- (3) Money market funds do not have a specified maturity date.
- (4) Florida PRIME has 18 positions in domestic corporate bonds and notes that it may tender for 100 percent of the principal amount, plus accrued interest with a minimum of 7 days prior notification to the trustee of the bonds or notes. The maturity dates on these positions range from September 1, 2037, to March 1, 2062.
- (5) Florida PRIME has three positions in municipal bonds and notes that it may tender for 100 percent of the principal amount, plus accrued interest with a minimum of 35 days prior notification to the trustee of the bonds or notes. The maturity dates on these positions are February 1, 2027, and December 1, 2059.

D. Investments, Fair Value Hierarchy

Florida PRIME's investments are carried at amortized cost, but fair value is reported in certain note disclosures as required by GAAP. Florida PRIME's investments are measured and reported at fair value and classified according to the following hierarchy:

Level 1 – Investments reflect unadjusted quoted prices in active markets for identical assets.

Level 2 – Investments reflect prices that are based on inputs that are either directly or indirectly observable for an asset (including quoted prices for similar assets), which may include inputs in markets that are not considered to be active.

Level 3 – Investments reflect prices based upon unobservable inputs for an asset.

The categorization of investments within the hierarchy is based upon the pricing transparency of the instrument and should not be perceived as the particular investment's risk.

Debt securities classified in Level 1 of the fair value hierarchy are valued using prices quoted in active markets for those securities. Debt securities classified in Level 2 of the fair value hierarchy are valued using a pricing methodology that uses evaluation models, such as matrix pricing, to value securities based on a security's relationship to benchmark quoted prices. Debt securities classified in Level 3 of the fair value hierarchy are subject to being priced by an alternative pricing source utilizing discounted cash flow models and broker bids, or may have an estimated fair value equal to cost, due to the absence of an independent pricing source.

Certain investments, such as time deposits, money market funds (with a stable NAV of \$1 per share), and repurchase agreements, are carried at cost or amortized cost.

Florida PRIME has the following fair value measurements as of June 30, 2024, and June 30, 2023 (expressed in thousands):

	Total Fair Value June 30, 2024	Fair Value Measurements Using		
		Quoted Prices in Active Market for Identical Assets Level 1	Significant Other Observable Inputs Level 2	Significant Unobservable Inputs Level 3
Investments by fair value level:				
Debt securities:				
Certificates of deposit	\$ 5,402,897	\$ -	\$ 5,104,463	\$ 298,434
Commercial paper	12,262,327	-	12,022,327	240,000
Domestic corporate bonds and notes	590,311	-	590,311	-
Municipal bonds and notes	44,420	-	44,420	-
Total investments measured at fair value	18,299,955	\$ -	\$ 17,761,521	\$ 538,434
Other investments carried at cost or amortized cost:				
Time deposits ⁽¹⁾	5,515,000			
Money market funds	3,251			
Repurchase agreements	1,563,000			
Total investments	\$ 25,381,206			

(1) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.

	Total Fair Value June 30, 2023	Fair Value Measurements Using		
		Quoted Prices in Active Market for Identical Assets Level 1	Significant Other Observable Inputs Level 2	Significant Unobservable Inputs Level 3
Investments by fair value level:				
Debt securities:				
Certificates of deposit	\$ 4,935,009	\$ -	\$ 4,835,009	\$ 100,000
Commercial paper	10,536,039	-	10,181,039	355,000
Money market funds	630,746	630,746	-	-
Domestic corporate bonds and notes	363,365	-	363,365	-
Municipal bonds and notes	14,850	-	14,850	-
Total investments measured at fair value	16,480,009	\$ 630,746	\$ 15,394,263	\$ 455,000
Other investments carried at cost or amortized cost:				
Time deposits ⁽¹⁾	4,180,000			
Money market funds	5,587			
Repurchase agreements	774,000			
Total investments	\$ 21,439,596			

(1) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.

E. Investment Credit Risk and Concentration of Credit Risk of Debt Securities

Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. Concentration of credit risk is the risk of loss attributed to the magnitude of the investment in a single issuer.

Pursuant to the Investment Policy Statement in effect at June 30, 2024, investment credit risk and concentration of credit risk of debt securities were managed as follows:

- The Investment Manager will purchase short-term, high-quality fixed income securities. To be considered high-quality, a security must be rated in the highest short-term rating category by one or more NRSROs or be deemed to be of comparable quality thereto by the Investment Manager, subject to Section 215.47(1)(j), Florida Statutes. The Investment Manager also may enter into special transactions for Florida PRIME like repurchase agreements. Each repurchase agreement counterparty must have an explicit issuer or counterparty credit rating in the highest short-term rating category from Standard & Poor's.
- The Investment Manager will perform a credit analysis to develop a database of issuers and securities that meet the Investment Manager's standard for minimal credit risk. The Investment Manager monitors the credit risks of all Florida PRIME portfolio securities on an ongoing basis by reviewing periodic financial data, issuer news and developments, and ratings of designated NRSROs.
- The Investment Manager generally will comply with the following diversification limitations that are additional to those set forth in GASB Codification Section In5. First, at least 50 percent of Florida PRIME assets will be invested in securities rated "A-1+" or those deemed to be of comparable credit quality thereto by the Investment Manager (i.e., so long as such deeming is consistent with the requirements of the NRSRO's AAAM (or equivalent) rating criteria), subject to Section 215.47(1)(j), Florida Statutes. Second, exposure to any single non-governmental issuer will not exceed 5 percent (at the time a security is purchased) and exposure to any single money market mutual fund will not exceed 10 percent of Florida PRIME assets.

In the event that a security receives a credit rating downgrade and ceases to be in the highest rating category, or the Investment Manager determines that the security is no longer of comparable quality to the highest short-term rating category (in either case, a "downgrade"), the Investment Manager will reassess whether the security continues to present minimal credit risk and will cause Florida PRIME to take any actions determined by the Investment Manager to be in the best interest of Florida PRIME. The Investment Manager will not be required to make reassessments if Florida PRIME disposes of the security (or the security matures) within five business days of the downgrade.

In the event that a security no longer meets the criteria for purchase due to default, event of insolvency, a determination that the security no longer presents minimal credit risks, or other material event (affected security), the Investment Manager must dispose of the security as soon as practical, consistent with achieving an orderly disposition of the affected security, by sale, exercise of a demand feature or otherwise. An affected security may be held only if the Executive Director has determined, based upon a recommendation from the Investment Manager and the Investment Oversight Group, that it would not be in the best interest of Florida PRIME to dispose of the security taking into account market conditions that may affect an orderly disposition.

Florida PRIME's credit quality ratings were as follows at June 30, 2024, and June 30, 2023 (fair values expressed in thousands):

Ratings ⁽¹⁾		Fair Value of Florida PRIME Investments as of June 30, 2024					
S&P	Moody's	Total	Certificates of Deposit	Commercial Paper	Money Market Funds	Repurchase Agreements	Corporate and Municipal Bonds and Notes
AAA		\$ 3,251	\$ -	\$ -	\$ 3,251	\$ -	\$ -
A-1		12,179,572	-	12,018,505	-	-	161,067
AA		147,030	-	-	-	-	147,030
A		308,714	-	-	-	-	308,714
	P-1	243,822	-	243,822	-	-	-
	Aaa	17,920	-	-	-	-	17,920
Not rated ⁽¹⁾	Not rated ⁽¹⁾	5,502,897	5,402,897	-	-	100,000	-
		<u>18,403,206</u>	<u>\$ 5,402,897</u>	<u>\$ 12,262,327</u>	<u>\$ 3,251</u>	<u>\$ 100,000</u>	<u>\$ 634,731</u>
		1,463,000	Repurchase agreements ⁽²⁾				
		5,515,000	Time deposits ⁽³⁾				
		<u>\$ 25,381,206</u>	Total				

(1) Ratings by S&P or Moody's indicative of the greatest amount of credit risk are presented. If both ratings indicate the same degree of credit risk, S&P ratings are reported. If only one of the two rating agencies provided a rating, that rating is reported. If neither rating agency provided a security specific credit rating, "Not rated" is reported. All the investments presented as "Not rated" had short-term issuer credit ratings that met Florida PRIME's investment and GASB Codification Section In5 guidelines.

(2) U.S. guaranteed obligations and collateral for repurchase agreements that the U.S. government explicitly guarantees do not require disclosure of credit quality.

(3) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.

Ratings ⁽¹⁾		Fair Value of Florida PRIME Investments as of June 30, 2023					
S&P	Moody's	Total	Certificates of Deposit	Commercial Paper	Money Market Funds	Repurchase Agreements	Corporate and Municipal Bonds and Notes
AAA		\$ 636,333	\$ -	\$ -	\$ 636,333	\$ -	\$ -
A-1		10,062,281	-	10,062,281	-	-	-
AA		170,125	-	-	-	-	170,125
A		98,110	-	-	-	-	98,110
	P-2 ⁽²⁾	473,758	-	473,758	-	-	-
	Aa	9,995	-	-	-	-	9,995
Not rated ⁽¹⁾	Not rated ⁽¹⁾	5,134,994	4,935,009	-	-	100,000	99,985
		<u>16,585,596</u>	<u>\$ 4,935,009</u>	<u>\$ 10,536,039</u>	<u>\$ 636,333</u>	<u>\$ 100,000</u>	<u>\$ 378,215</u>
		674,000	Repurchase agreements ⁽³⁾				
		4,180,000	Time deposits ⁽⁴⁾				
		<u>\$ 21,439,596</u>	Total				

(1) Ratings by S&P or Moody's indicative of the greatest amount of credit risk are presented. If both ratings are the same, S&P ratings are reported. If only one of the two rating agencies provided a rating, that rating is reported. If neither rating agency provided a security specific credit rating, "Not rated" is reported. All of the investments presented as "Not rated" had short-term issuer credit ratings that met Florida PRIME's investment and GASB Codification Section In5 guidelines.

(2) Per GASB Codification Section In5, if an external investment pool is aware that a security has multiple ratings and the rating categories conflict, the following provision applies. If the security has more than two ratings, the security should be considered to be in the highest category of ratings as determined by at least two ratings. The securities presented with a P-2 rating have two additional credit ratings in the highest category of ratings with other NRSRO's.

(3) U.S. guaranteed obligations and collateral for repurchase agreements that the U.S. government explicitly guarantees do not require disclosure of credit quality.

(4) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.

With respect to the concentration of credit risk at June 30, 2024, Florida PRIME had exposure of more than 5 percent to each of the following issuers (carrying values and fair values expressed in thousands):

As of June 30, 2024				
Issuer Name	Carrying Value	Percent of Portfolio Carrying Value	Fair Value	Percent of Portfolio Fair Value
ABN Amro Bank N.V. ^{(1),(3)}	\$ 1,275,000	5.02%	\$ 1,275,000	5.02%
Australia & New Zealand Banking Group, Ltd. ^{(1),(3)}	\$ 1,275,000	5.02%	\$ 1,275,000	5.02%
Bank of America Corporation ^{(1),(2)}	\$ 1,959,000	7.72%	\$ 1,958,693	7.72%
Cooperatieve Rabobank U.A. ^{(1),(3)}	\$ 1,275,000	5.02%	\$ 1,275,000	5.02%

- (1) Under GASB Codification Section In5, liquidations are not required for exposures over 5 percent if the overage is caused by participant account movements (i.e., a decrease in overall participant balances caused by subsequent net participant withdrawals). The excess exposure was caused by participant account movements.
- (2) For Bank of America Corporation, \$1.3 billion is held in a repurchase agreement. Per GASB Codification Section In5, repurchase agreements are considered to be the acquisition of the underlying securities if the repurchase agreement is fully collateralized. This repurchase agreement was fully collateralized by U.S. government guaranteed securities. Excluding this repurchase agreement, Florida PRIME's exposure to Bank of America Corporation was 2.54 percent of both the carrying value and the fair value.
- (3) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.

At June 30, 2023, Florida PRIME had exposure of more than 5 percent to each of the following issuers (carrying values and fair values expressed in thousands):

As of June 30, 2023				
Issuer Name	Carrying Value	Percent of Portfolio Carrying Value	Fair Value	Percent of Portfolio Fair Value
Australia & New Zealand Banking Group, Ltd. ^{(1),(3)}	\$ 1,090,000	5.08%	\$ 1,090,000	5.08%
Bank of America Corporation ^{(1),(2)}	\$ 1,174,000	5.48%	\$ 1,173,245	5.47%
Bank of Montreal ⁽¹⁾	\$ 1,080,000	5.04%	\$ 1,080,437	5.04%
Canadian Imperial Bank of Commerce ⁽¹⁾	\$ 1,089,798	5.08%	\$ 1,089,934	5.08%
Cooperatieve Rabobank U.A. ^{(1),(3)}	\$ 1,090,000	5.08%	\$ 1,090,000	5.08%
Sumitomo Mitsui Trust Holdings Inc. ⁽¹⁾	\$ 1,083,892	5.06%	\$ 1,083,966	5.06%

- (1) Under GASB Codification Section In5, liquidations are not required for exposures over 5 percent if the overage is caused by participant account movements (i.e., a decrease in overall participant balances caused by subsequent net participant withdrawals). The excess exposure was caused by participant account movements.
- (2) For Bank of America Corporation, \$524 million is held in a repurchase agreement. Per GASB Codification Section In5, repurchase agreements are considered to be the acquisition of the underlying securities if the repurchase agreement is fully collateralized. This repurchase agreement was fully collateralized by U.S. government guaranteed securities. Excluding this repurchase agreement, Florida PRIME's exposure to Bank of America Corporation was 3.03 percent of both the carrying value and the fair value.
- (3) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.

F. Investments, Custodial Credit Risk

Custodial credit risk for investments is the risk that, in the event of the failure of the counterparty, the SBA will not be able to recover the value of investment or collateral securities that are in the possession of an outside party.

The SBA's policy is that custodial credit risk will be minimized through the use of trust accounts maintained at top tier third-party custodian banks. To the extent possible, negotiated trust and custody contracts shall require that all deposits, investments, and collateral be held in accounts in the SBA's name, separate and apart from the assets of the custodian banks.

The SBA engaged BNY (Custodian) to provide asset safekeeping, custody, fund accounting, and performance measurement services to Florida PRIME. At June 30, 2024, and June 30, 2023, all investments, except those in money market funds in which the SBA invests (i.e., in commingled funds with other investors), were held in the SBA's name by the SBA's custodial bank.

G. Investments, Interest Rate Risk

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of investments. Pursuant to the Investment Policy Statement, the Investment Manager will target a dollar-weighted average maturity (DWAM) range for Florida PRIME based on its interest rate outlook. The Investment Manager will formulate its interest rate outlook by analyzing a variety of factors, such as current and expected U.S. economic growth; current and expected interest rates and inflation; and the Federal Reserve Board's monetary policy. The Investment Manager will generally shorten Florida PRIME's DWAM when it expects interest rates to rise and extend Florida PRIME's DWAM when it expects interest rates to fall. The Investment Manager will exercise reasonable care to maintain a DWAM of 60 days or less for Florida PRIME. For purposes of calculating DWAM, the maturity of an adjustable rate security generally will be the period remaining until its next interest rate reset date.

Presented below are the investments held in Florida PRIME at June 30, 2024, and June 30, 2023, at fair value (expressed in thousands), with the DWAM for each security type:

As of June 30, 2024

Investment Type	Fair Value	Dollar Weighted Average Maturity (in Days)⁽¹⁾
Time deposits ⁽²⁾	\$ 5,515,000	2
Certificates of deposit ⁽³⁾	5,402,897	74
Commercial paper ⁽³⁾	12,262,327	54
Money market funds ⁽⁴⁾	3,251	1
Repurchase agreements	1,563,000	1
Domestic corporate bonds and notes	590,311	85
Municipal bonds and notes	44,420	24
Total	<u>\$ 25,381,206</u>	
Portfolio dollar-weighted average maturity (DWAM)		45

- (1) Interest rate reset dates are used in the calculation of the DWAM.
- (2) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.
- (3) Certificates of deposit and commercial paper include domestic and U.S. dollar denominated foreign issues.
- (4) The DWAM of the underlying securities in the money market fund at June 30, 2024, was 44 days. However, the money market fund provided daily liquidity.

As of June 30, 2023

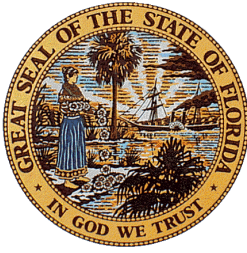
Investment Type	Fair Value	Dollar Weighted Average Maturity (in Days)⁽¹⁾
Time deposits ⁽²⁾	\$ 4,180,000	4
Certificates of deposit ⁽³⁾	4,935,009	85
Commercial paper ⁽³⁾	10,536,039	32
Money market funds ⁽⁴⁾	636,333	3
Repurchase agreements	774,000	3
Domestic corporate bonds and notes	363,365	6
Municipal bonds and notes	14,850	35
Total	<u>\$ 21,439,596</u>	
Portfolio dollar-weighted average maturity (DWAM)		37

- (1) Interest rate reset dates are used in the calculation of the DWAM.
- (2) Time deposits are included in "Cash and cash equivalents" on the Statements of Net Position.
- (3) Certificates of deposit and commercial paper include domestic and U.S. dollar denominated foreign issues.
- (4) The DWAM of the underlying securities in the two money market funds at June 30, 2023, ranged from 3 to 27 days. However, the money market funds provided daily liquidity.

GASB Codification Section In5 also requires the portfolio of a qualifying external investment pool to maintain a weighted average life (WAL) of 120 days or less. A weighted average life measure expresses the average length of time that each dollar of principal remains unpaid without considering the maturity shortening features used in calculating the DWAM. Pursuant to the Investment Policy Guidelines, the Investment Manager will exercise reasonable care to maintain a maximum WAL within the range of 90 to 120 days for Florida PRIME. The WAL for Florida PRIME at both June 30, 2024, and June 30, 2023, was 81 days.

H. Investments, Foreign Currency Risk

Investment policy guidelines prohibit the Investment Manager from purchasing investments denominated in foreign currency, therefore all Florida PRIME securities are U.S. dollar denominated. Florida PRIME was not exposed to foreign currency risk during the fiscal years ended June 30, 2024, and June 30, 2023.



Sherrill F. Norman, CPA
Auditor General

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The President of the Senate, the Speaker of the
House of Representatives, and the
Legislative Auditing Committee

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*

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the State Board of Administration (SBA) Local Government Surplus Funds Trust Fund (Florida PRIME) as of and for the fiscal year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the Florida PRIME's basic financial statements, and have issued our report thereon dated December 13, 2024, included under the heading **INDEPENDENT AUDITOR'S REPORT**.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the SBA'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 SBA's internal control. Accordingly, we do not express an opinion on the effectiveness of the SBA'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 Florida PRIME's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material

weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether Florida PRIME's financial statements are free from material misstatement, we performed tests of the SBA's compliance with certain provisions of laws, rules, regulations, contracts, and policies, 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*.

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 SBA'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 SBA's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Respectfully submitted,

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is fluid and cursive, with a large initial "S" and "N".

Sherrill F. Norman, CPA
Tallahassee, Florida
December 13, 2024