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**CollegeCounts, Alabama 529
Savings Program
Executive Summary
Second Quarter 2019**

Prepared by

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Market Environment

Second Quarter Market Environment

Global Economy

The U.S. economic picture continues to be mixed. First quarter real GDP was +3.1% (y/y) but is expected to slow. Weakness in manufacturing persists, while a strong labor market and rising personal income have supported consumer spending. Overseas, global growth continued to decelerate but remained positive. Trade talks with several countries are fluid; a no-deal Brexit this October is no longer a remote possibility; and tensions with Iran are mounting.

U.S.

- First quarter real GDP grew by 3.1% (y/y)
 - Exports rose 4.8% while imports declined 2.5%; net exports contributed nearly 1 percentage point to the GDP gain
 - Government spending increased at a 2.5% annual rate
 - Personal consumption expenditures rose 1.3% in the quarter
 - Corporate profits decreased 2.8% during 1Q19 after decreasing 0.4% in 4Q18
- Unemployment rate hovers at a five-year low of 3.6%
 - Wage growth remained sluggish at +3.1% (y/y) in May
- Inflation remained elusive
 - Headline CPI up 1.8% (y/y) in May; less volatile Core CPI also rose by 2.0% (y/y)
 - Core PCE Deflator, falling short of its 2% target, rose 1.6% over the trailing year
- Manufacturing continues to be a point of weakness
 - PMI (51.7) continued to signal expansion but sharply off its August 2018 peak of 60.8
- The Fed left target rates unchanged at 2.25%-2.50%
 - Fed fund futures now pricing in a 100% probability of a rate cut in July and a >50% probability of three additional 25 bps cuts in 2019

Overseas

- Euro zone
 - First quarter GDP rose 1.2% (y/y), same as in 4Q18
 - Core inflation rate was +1.2% (y/y) in May
 - Unemployment fell to its lowest in more than a decade
 - ECB hinted that further monetary policy easing could be on the way if the inflation outlook fails to improve
- U.K. economy grew at its fastest pace since 3Q17
 - First quarter GDP rose 1.8% (y/y), helped by stockpiling by manufacturers fearful of the impact from a no-deal Brexit
 - Delay to Brexit until Oct. 31 unless there is an early agreement

- U.K. manufacturing PMI for May slipped below 50, the level which separates expansion from contraction, for the first time since 2016
- Japan's economy growth revised slightly higher
 - Economy grew at 2.2% (y/y) in Q1, supported by the expansion in capital spending
 - Imports fell faster than exports in Q1, underlining rising pressure across the economy as consumers hesitate to spend
 - Inflation remained low at +0.8% (y/y) in May
- China's economy expanded by 6.3% (y/y) in Q1, driven by rising industrial production and retail sales
 - China's policymakers stepped up the pace of fiscal and monetary stimulus in Q2 but credit growth remains subdued

Fixed Income

U.S. Treasury yields hit multi-year lows in June as slowing global growth and benign inflation raised expectations for rate cuts. The market implied probability of a cut in July was 100% as of quarter-end. Overseas, rates were also lower reflecting similar themes as well as comments from European Central Bank (ECB) President Mario Draghi suggesting that rates could be cut and/or asset purchase programs restarted if inflation does not reach the bank's target. Emerging market debt also performed well, benefitting from lower rates as well as a risk-on theme.

U.S. Fixed Income

- U.S. rates fell as markets anticipated Fed rate cuts would be imminent; portions of the yield curve remained inverted
 - 2-year U.S. Treasury Note declined 52 bps to close at 1.75%
 - 10-year Treasury Note finished at 2.0%, lowest since 2016
 - 30-year Treasury closed at 2.52%
 - Portions of the yield curve inverted but spread between the 2-year and 10-year Treasury note remained positive at 25 bps as of June 30
- Blmbg Barclays Aggregate rose 3.1% with investment grade corporates up the most
 - Blmbg Barclays Corporate: +4.5%; 9.9% y-t-d
 - Blmbg Barclays US Treasury: +3.0%; 5.2% y-t-d
 - Blmbg Barclays MBS: +2.0%; 4.2% y-t-d
- TIPS underperformed nominal Treasuries as inflation expectations fell
 - 10-year breakeven inflation rate at 1.69% (6/30) from 1.88% (3/31)
 - Blmbg Barclays TIPS Index: +2.9%; +6.2% y-t-d
- High yield corporates lagged investment grade
 - Blmbg Barclays High Yield: +2.5%; +9.9% y-t-d

- Municipals underperformed Treasuries
 - Blmbg Barclays Municipal Bond Index: +2.1%; +5.1% y-t-d

Non-U.S. Fixed Income

- Non-US developed bonds posted positive returns as interest rates in developed markets generally fell during the quarter
 - Blmbg Barclays Global Agg ex-U.S. (unhedged): +3.4%; +5.0% y-t-d
 - Blmbg Barclays Global Agg ex-U.S. (hedged): +2.8%; +5.8% y-t-d
 - German 10-year bund yield hit new record low and closed the quarter at -0.33%; the 2-year ended at -.76%
 - Manufacturing weak in Europe and Asia, as in the U.S.
 - Inflation was under 2% and real GDP growth was also less than 2% in Q1 across developed markets (the U.S. being the exception)
- Negative yielding debt globally hit a new high of nearly \$13 trillion and is now roughly 25% of the Global Aggregate Index
- Emerging market debt performed well
 - The US dollar-denominated JPM EMBI Global Diversified Index gained 4.1%; +11.3% y-t-d
 - Local currency emerging market debt, as measured by the JPM GBI-EM Global Diversified rose 5.6%; +8.7% y-t-d
 - Brazil: +7.4%
 - Mexico: +6.1%
 - Russia: +10.4%
 - Turkey: +10.1%
 - Argentina was worst performer at -5.0% for the quarter. Argentina has one of the world's highest policy rates at just over 20%

U.S. Equity

U.S. Equity markets approached record levels as investors were heartened by the potential for imminent Fed rate cuts. The S&P 500 rose 4.3% with nearly all sectors posted positive returns except for Energy. Non-U.S. developed markets equities were also buoyed by optimism for rate cuts. Emerging markets posted a slight gain in a volatile period when geopolitical risks and trade tensions played on the minds of investors.

- S&P 500 Index gained 4.3% in Q2
 - Nearly all sectors posted gains except for Energy (-2.8%); Financials (+8.0%) was the best performing sector
 - With a forward P/E for the S&P 500 at 16.7x, equity multiples are slightly above their longer-term, 25-year average of 16.2x
 - Quality factors such as ROE were positive in Q2; strong reversal from Q1
 - Value factors were mixed while Growth factors were positive

- Growth outperformed Value, widening y-t-d divergence
 - R1000 Growth: +4.6%; +21.5% y-t-d
 - R1000 Value: +3.8%; +16.2% y-t-d

- Small caps modestly underperformed large caps
 - R1000: +4.2%; +18.8% y-t-d
 - R2000: +2.1%; +17.0% y-t-d

- High-flying growth stocks “FAAMG” plus Netflix
 - Contribution to return: +23% (S&P 500); +37% (R1000 Growth)

	2Q19	YTD
Facebook	+15.8	+47.2
Apple	+4.6	+26.5
Amazon	+6.3	+26.1
Microsoft	+14.0	+32.9
Google (Alphabet Class C)	-7.9	+4.4
Netflix	+3.0	+37.2

International Equity

- Non-U.S. developed markets gained in Q2, despite a steep fall in May due to concerns over the U.S.-China trade war
 - ACWI ex-US: +3.0%; +13.6% y-t-d
 - Nearly all sectors posted positive returns; but Real Estate (-1.6%) fell after Berlin’s city government proposed a five-year freeze on residential property rents from 2020
 - After a strong Q1, U.K. (+0.9%) remained relatively flat due to slowdown in manufacturing sector
 - Japan (+1.0%) also posted a muted return owing to weakness in May; trade tensions and the U.S. campaign against China-based Huawei weighed on Japanese electronic component suppliers

- Local currencies were mixed against the U.S. dollar
 - Euro, Japanese yen and most EM currencies strengthened
 - British pound and Chinese yuan weakened against the U.S. dollar

- Emerging markets recorded a slight gain in a volatile quarter
 - MSCI EM: +0.6%; +10.6% y-t-d
 - Mixed sector results: Financials (+4.0%); Health Care (-6.6%)
 - Argentina (+31.7%) was the best performing country where political developments boosted sentiment
 - Russia (+16.9%), Brazil (+7.2%) and India (+0.5%) were up

- China (-4.0%) and China A-shares (-3.4%) finished in negative territory; the market was able to recover after May's pull-back thanks to the pause in tariff hikes following the G20 Osaka summit

Liquid Real Assets

Liquid real assets posted mixed results for the second quarter of the year. Oil pulled back but was roughly flat for the quarter. MLPs and REITs also posted modest gains while listed infrastructure performed better. Commodities were mixed, with gold being the star performer. TIPS underperformed nominal US Treasuries as inflation expectations fell.

- Brent crude oil prices pulled back but was roughly flat for the quarter, ending at \$58.47/barrel
 - S&P 1200 Energy: -1.5%; 12.9% y-t-d
 - Alerian MLP Index: +0.1%; +17.0% y-t-d
- Commodities mixed
 - Bloomberg Commodity TR Index: -1.2%; +5.1% y-t-d
 - Both the Precious Metals (+7.2%) and Agriculture (+4.5%) were positive, driven by strong individual returns for Gold (+9%) as well as Corn, Wheat, and Coffee, respectively
 - Livestock, Energy and Industrial Metals all posted negative quarterly returns
 - GS Commodity Index: -1.4%; +13.3% y-t-d
 - S&P Gold Spot Price Index: +8.9%; +10.3% y-t-d
- Listed Infrastructure and Real Estate posted modest gains
 - DJ-Brookfield Global Infrastructure Index: +4.3%; +20.7% y-t-d
 - FTSE NAREIT: +1.2%; +17.8% y-t-d
 - FTSE EPRA/NAREIT Global: +0.1%; 14.9% y-t-d
- TIPS delivered a positive return
 - Blmbg Barclays TIPS Index: +2.9%; +6.2% y-t-d
 - 10-year breakeven inflation rate at 1.69% (6/30) from 1.88% (3/31)

Capital Markets Preview

U.S. EQUITY

Markets continued to march upward, and U.S. equities neared record highs. Growth outpaced value, as the dovish stance of the Fed was a headwind for valuation-sensitive stocks. Small cap stocks lagged large caps, possibly from economic weakness.

Large Cap U.S. Equity (S&P 500: +4.3%; Russell 1000: +4.2%)

- U.S. equity showed strong gains as market participants anticipated another round of monetary easing from the Fed.
- Financials (+8.0%) was the best-performing sector; Energy (-2.8%) was the only sector to experience negative returns over the quarter.
- Trade rhetoric weighed on U.S. stocks in May followed by a June rebound.
- Given the increase in risk appetite, cyclicals outperformed while defensive sectors such as Utilities underperformed.

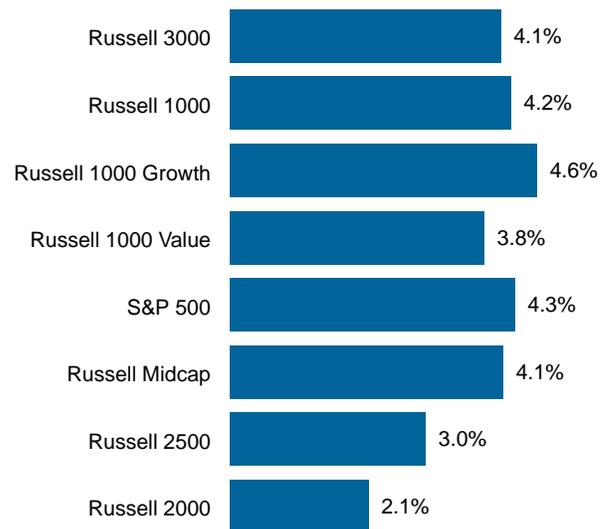
Growth vs. Value (Russell 1000 Growth: +4.6%; Russell 1000 Value: +3.8%)

- Value factors (P/B, P/E trailing, and yield) were mixed while growth factors (EPS growth, sales growth) were positive in the quarter.

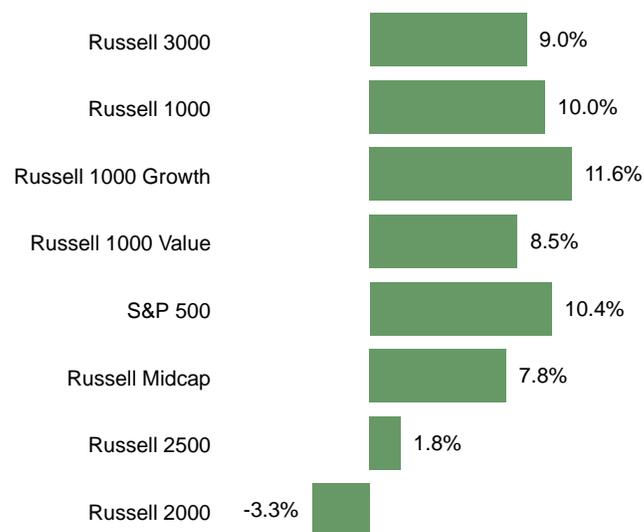
Small Cap (Russell 2000: +2.1%)

- Market conditions (e.g., more dovish Fed, strong U.S. dollar, trade tensions) should have benefited small cap companies, but did not.
- A slowing economy may explain weakness for small caps. Large caps tend to have stronger balance sheets and are more capable of weathering downturns.

U.S. Equity: Quarterly Returns

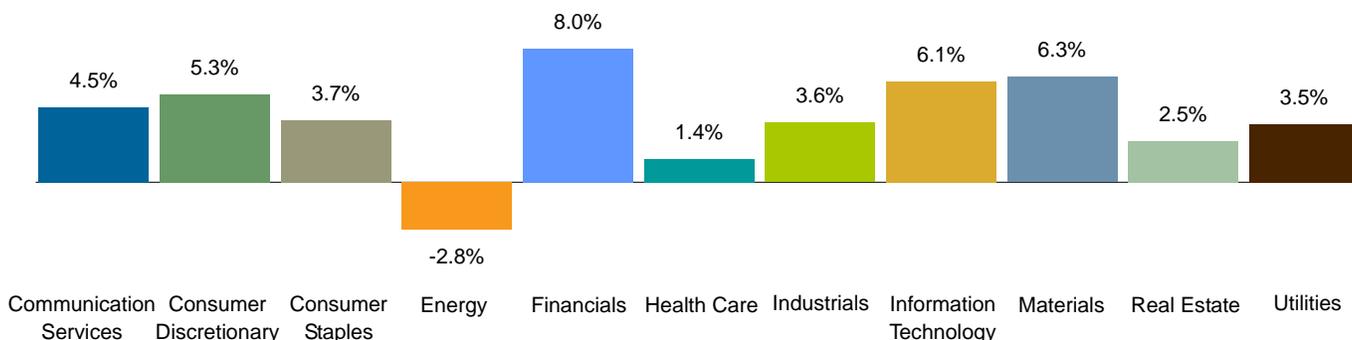


U.S. Equity: One-Year Returns



Sources: FTSE Russell, Standard & Poor's

S&P Sector Returns, Quarter Ended June 30, 2019



Source: Standard & Poor's

NON-U.S./GLOBAL EQUITY

Global equity markets were largely positive in the second quarter although investor sentiment was fairly muted as both U.S./China tariff fatigue and Brexit uncertainty continued. Some non-U.S. markets benefited from a weakening U.S. dollar relative to local currencies. Global equities were boosted by dovish central bank commentary that led to lower interest rates around the globe.

Global/Non-U.S. Developed (MSCI EAFE: +3.7%; MSCI World ex USA: +3.8%; MSCI ACWI ex USA: +3.0%; MSCI Europe: +4.5%; MSCI Japan: +1.0%)

- Developed markets rallied as central banks around the world expressed more accommodative paths with interest rates and quantitative easing.
- U.K. equities finished the quarter slightly up (+0.9%) as Brexit uncertainty continues. Prime Minister Theresa May announced her resignation during the quarter.
- Relative to other developed non-U.S. markets, Europe had a strong quarter fueled by robust returns from Germany, France, and Switzerland (30% combined weight), which benefited from declining bond yields.
- EAFE sector performance was positive across the board with the exception of real estate. Cyclical drove the majority of returns as these are highly correlated with U.S. cyclical, which benefited from declining interest rates.
- Factor performance in non-U.S. developed markets favored growth over value, large caps over small caps, and cyclical over defensives.

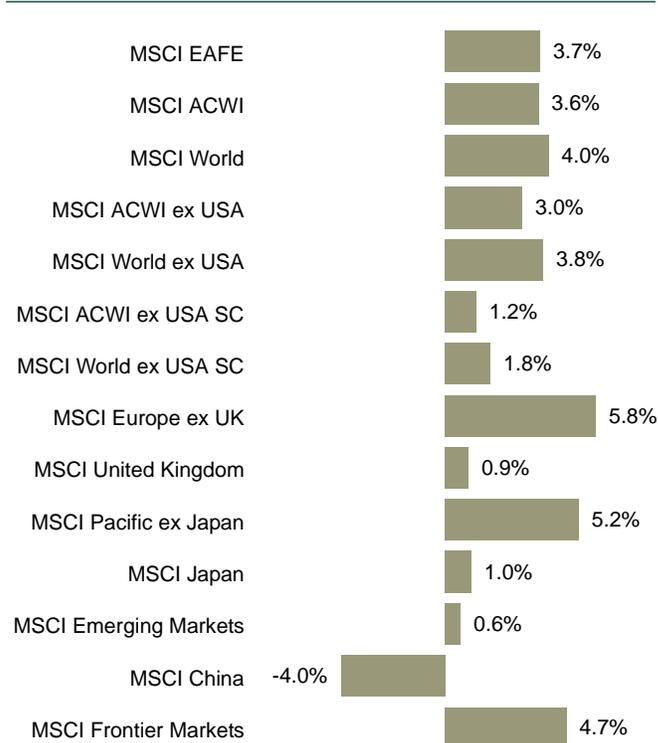
Emerging Markets (MSCI Emerging Markets Index: +0.6%)

- Emerging market returns were lackluster although, regionally, returns were bar-belled as many Asian countries were held back by trade concerns while EM ex-Asia tended to perform well. Russia (+16.9%) performed strongly with the help of the ruble appreciating by 4.2% relative to the U.S. dollar. Brazil (+7.2%) was also a top contributor due to the initial success of keeping pension reforms on track. China (-4.0%) faltered on tariff concerns.
- Argentina (+31.7%) was the top country performer, aided by MSCI's announcement of its inclusion in the MSCI Emerging Markets Index at the end of May (eight stocks in total).
- The MSCI EM Value Index outperformed the MSCI EM Growth Index as many growth-oriented sector and country returns were impacted by trade disputes.

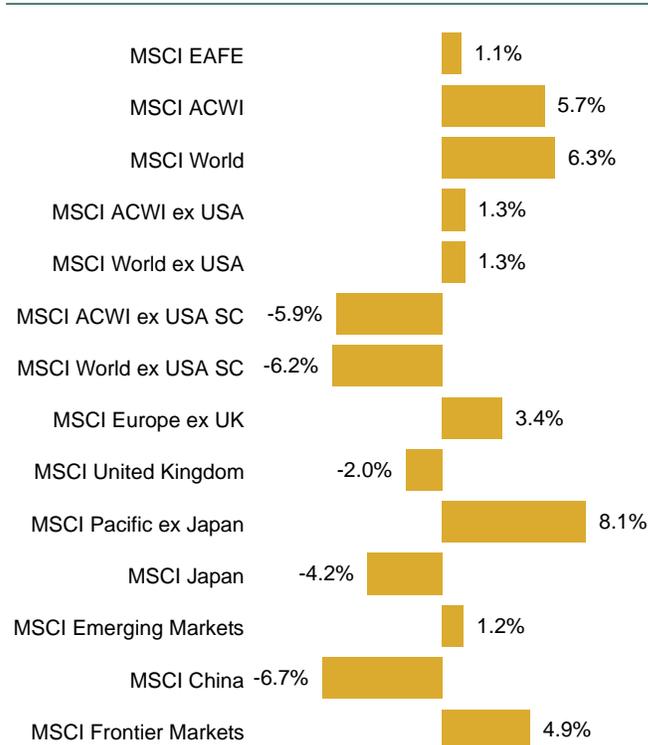
Non-U.S. Small Cap (MSCI World ex USA Small Cap: +1.8%; MSCI EM Small Cap: +1.0%; MSCI ACWI ex USA Small Cap: +1.2%)

- Non-U.S. small caps lagged large caps as investors preferred lower earnings risk and higher earnings momentum. Emerging market small caps lagged large caps as investors searched for a combination of lower volatility and higher growth that was absent in smaller companies as tariff uncertainty persisted.

Global Equity: Quarterly Returns



Global Equity: One-Year Returns



Source: MSCI

FIXED INCOME

U.S. economic data continued to be mixed as a strong labor market and rising personal income offset waning business confidence and declining industrial production. The Federal Reserve’s dovish statements and announced policy objective to “sustain the expansion” caused risk assets and U.S. Treasury yields to rally. Uncertainty surrounding trade policy and muted inflation data provided the Fed with additional cover for its rationale to potentially cut rates later this year.

U.S. Fixed Income (Bloomberg Barclays US Aggregate Bond Index: +3.1%)

- U.S. Treasuries gained 3.0% as the U.S. Treasury yield curve shifted lower across maturities, most dramatically at the 2-year key rate, as traders priced in expectations for the Fed to pre-emptively ease in order to boost domestic economic growth.
- The overall shape of the yield curve did not materially change during the quarter. The yield differential between the 10-year and 2-year key rates remained positive and widened 11 basis points during the quarter to close at 25 bps. However, the front-end of the curve remained inverted, with the 5-year offering less yield than the 2-year key rate.
- Nominal Treasuries outperformed TIPS as inflation expectations fell; the 10-year breakeven spread was only 1.69% as of quarter-end versus 1.88% at the end of the first quarter.

Investment Grade Corporates (Bloomberg Barclays Corporate: +4.5%)

- Credit spreads rallied on the back of dovish Fed policy.
- Gross new corporate supply this quarter was \$290.5 billion, which was 14% lower than a year ago. Year-to-date supply was 18% lower than in the first half of 2018. New issuance favored the 6-12 year maturities relative to last year.
- AAA-rated corporates (+5.0%) were the best performers in absolute return terms. BBB-rated lagged AAA by 18 bps, but posted a positive excess return over the index (+1.4%).

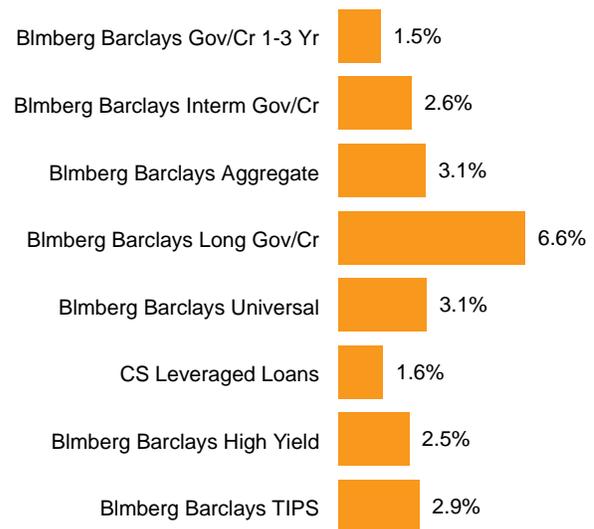
High Yield (Bloomberg Barclays Corporate High Yield: +2.5%)

- High yield corporates posted positive results for the quarter, but lagged investment grade corporates on both absolute and excess returns. High yield gained 9.9% for the first half of 2019.
- Interest rate sensitive BB-rated issues posted the highest return (+3.1%) while CCC-rated issues rose 0.3%.

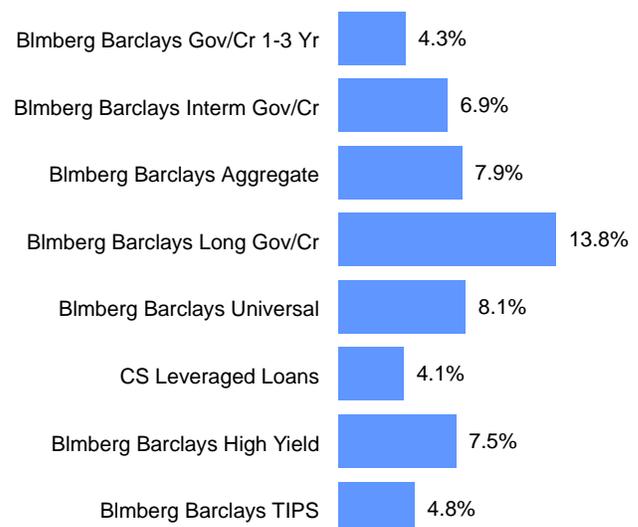
Leveraged Loans (CS Leveraged Loans: +1.6%)

- Bank loans participated in the risk-on rally, but lagged both longer duration IG and HY corporates as interest rates declined.

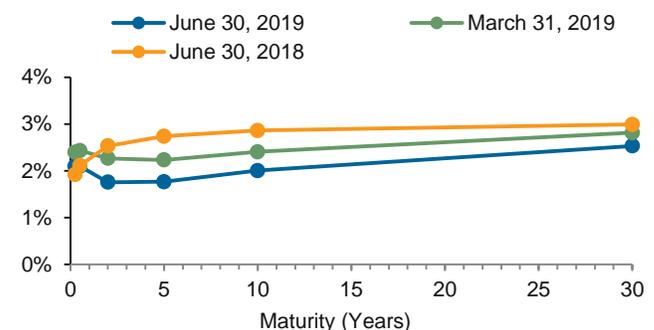
U.S. Fixed Income: Quarterly Returns



U.S. Fixed Income: One-Year Returns



U.S. Treasury Yield Curves



Sources: Bloomberg, Bloomberg Barclays, Credit Suisse

- Retail outflows remain unabated as the Fed’s dovish tone dampened enthusiasm for floating rate assets. New CLO issuance running ahead of expectations has also put technical pressure on the sector as investors absorbed the new float.
- Bank loans have less sensitivity to interest rates, but may have a similar spread duration profile to that of high yield bonds.

NON-U.S. FIXED INCOME

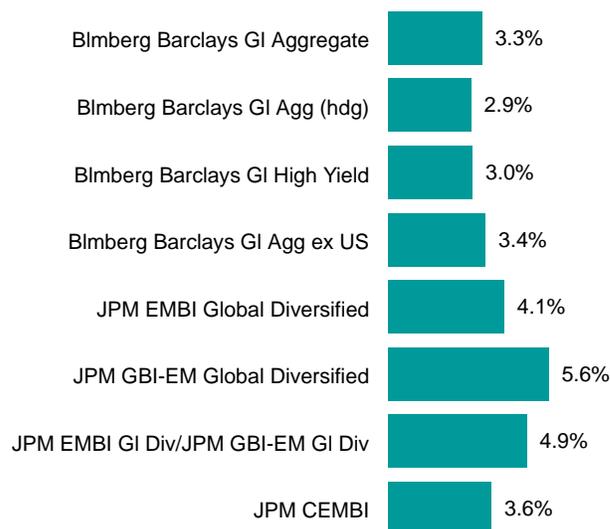
Global Fixed Income (Bloomberg Barclays Global Aggregate: +3.3%, unhedged)

- Other developed market sovereign bonds rose in tandem with the rally in Treasuries and have pushed European sovereigns further into negative yields. The U.S. dollar depreciated modestly versus the euro and yen, but gained versus the U.K. pound.

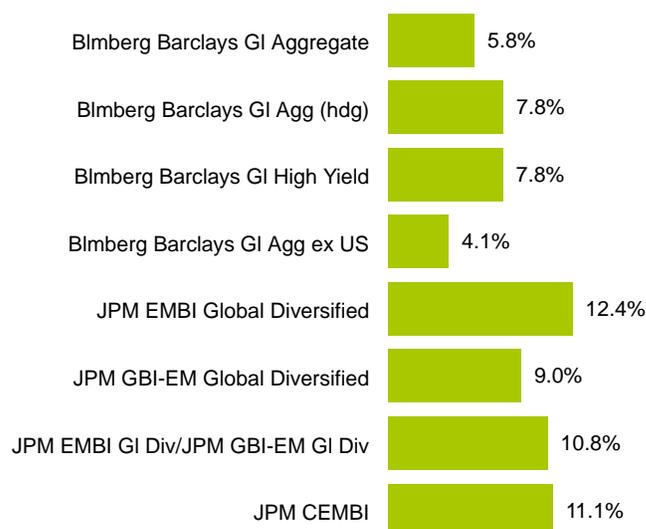
US\$ EMD (JPM EMBI Global Diversified: +4.1%), **Local Currency EMD** (JPM GBI-EM Global Diversified: +5.6%)

- Most emerging market currencies appreciated against the U.S. dollar.
- Top performers included Russia (+10.4%) and Turkey (+10.1%), while Argentina was the worst performer (-5.0%), and one of the few countries to post a negative result this quarter.

Global Fixed Income: Quarterly Returns

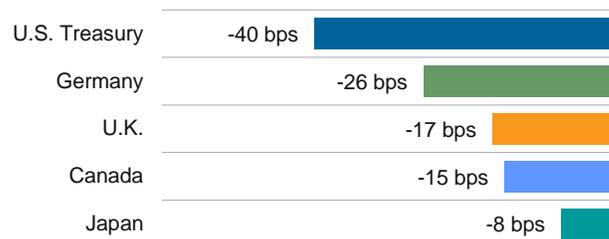


Global Fixed Income: One-Year Returns



Change in 10-Year Global Government Bond Yields

1Q19 to 2Q19



Sources: Bloomberg, Bloomberg Barclays, JP Morgan

Range of Mutual Fund Returns

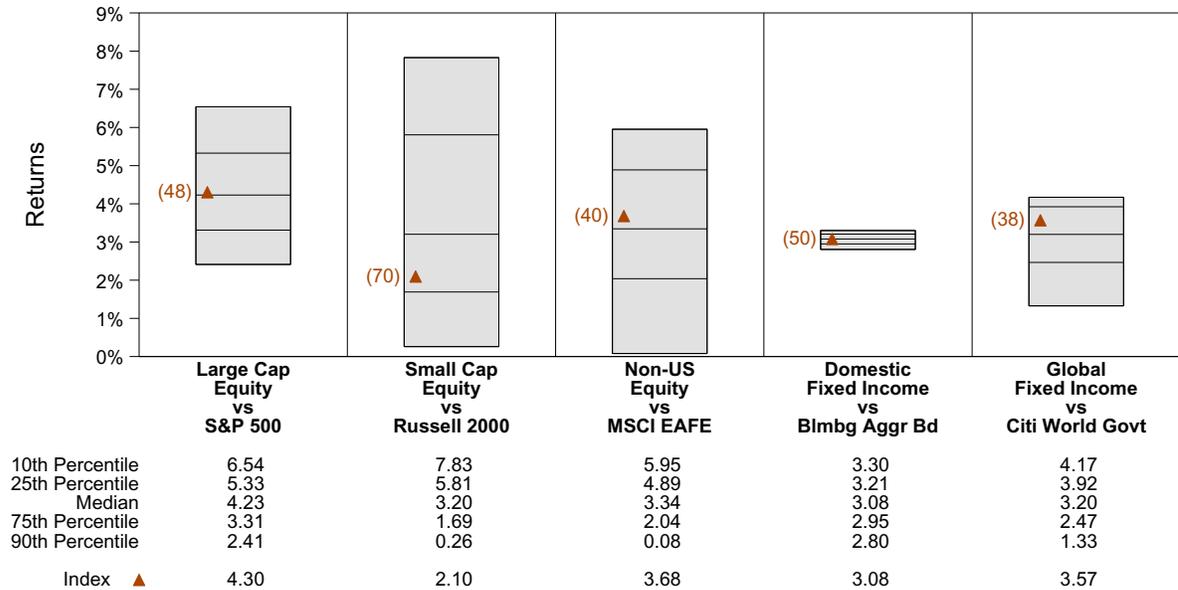
Market Overview

Active Management vs Index Returns

Market Overview

The charts below illustrate the range of returns across managers in Callan's Mutual Fund database over the most recent one quarter and one year time periods. The database is broken down by asset class to illustrate the difference in returns across those asset classes. An appropriate index is also shown for each asset class for comparison purposes. As an example, the first bar in the upper chart illustrates the range of returns for domestic equity managers over the last quarter. The triangle represents the S&P 500 return. The number next to the triangle represents the ranking of the S&P 500 in the Large Cap Equity manager database.

Range of Mutual Fund Returns by Asset Class One Quarter Ended June 30, 2019



Range of Mutual Fund Returns by Asset Class One Year Ended June 30, 2019

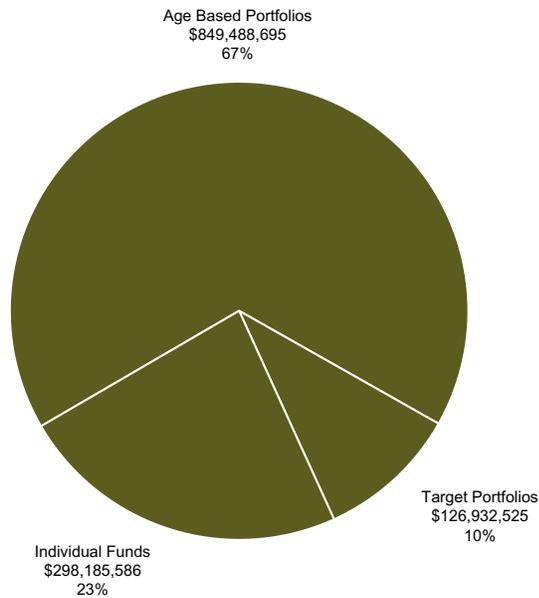


Advisor Plan Performance

Changes in Investment Fund Balances Period Ended June 30, 2019

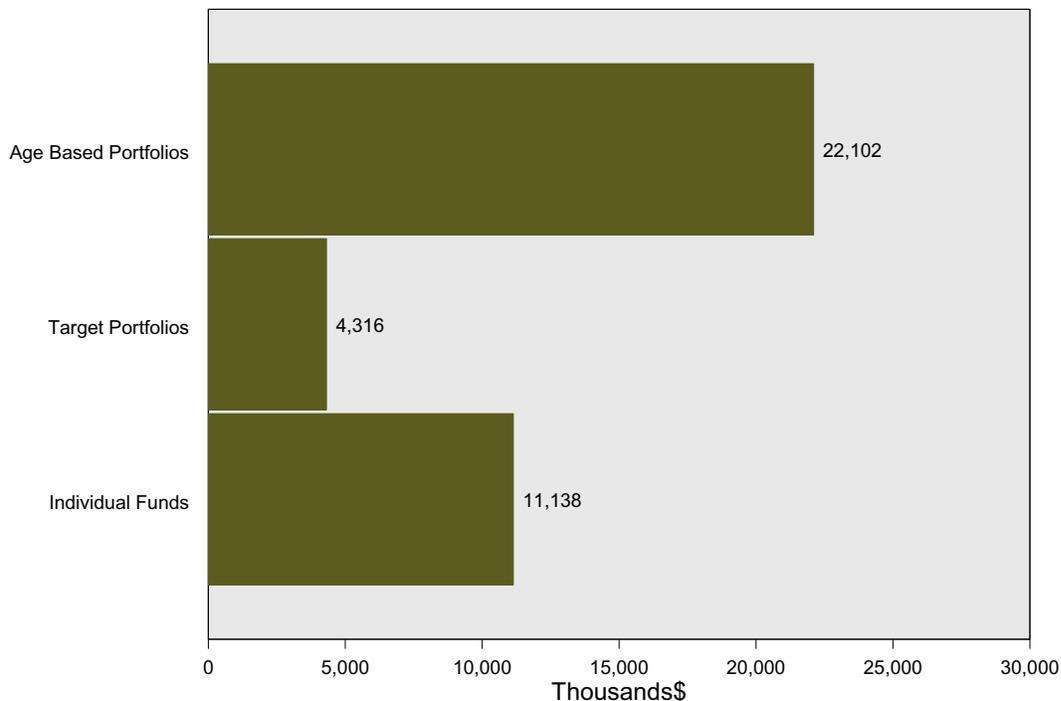
Allocation Across Investment Options

The chart below illustrates the allocation of the aggregate fund assets across the various investment options for the quarter ended June 30, 2019.



Changes in Fund Values

The chart below shows the net change in fund values across the various investment options for the quarter ended June 30, 2019. The change in value for each fund is the result of a combination of 3 factors: 1) market movements; 2) contributions or disbursements into or out of the funds by the participants (and any matching done by the company); and 3) transfers between funds by the participants.



Investment Fund Balances

The table below compares the fund's investment fund balances as of June 30, 2019 with that of March 31, 2019. The change in asset distribution is broken down into the dollar change due to Net New Investment and the dollar change due to Investment Return.

Asset Distribution Across Investment Funds

	June 30, 2019				March 31, 2019	
	Market Value	Weight	Net New Inv.	Inv. Return	Market Value	Weight
Age Based Portfolios	\$849,488,695	66.65%	\$3,191,309	\$18,910,491	\$827,386,895	66.88%
Aggressive	\$451,143,899	35.39%	\$1,545,366	\$10,622,613	\$438,975,920	35.49%
0-2 years (Fund 100)	9,307,772	0.73%	(96,409)	282,844	9,121,337	0.74%
3-5 years (Fund 90)	24,951,473	1.96%	(313,550)	714,383	24,550,640	1.98%
6-8 years (Fund 80)	36,568,898	2.87%	(428,637)	1,009,836	35,987,699	2.91%
9-10 years (Fund 70)	35,215,652	2.76%	751,167	881,906	33,582,579	2.71%
11-12 years (Fund 60)	50,127,852	3.93%	(3,319,626)	1,287,188	52,160,290	4.22%
13-14 years (Fund 50)	69,458,959	5.45%	(3,030,666)	1,749,156	70,740,469	5.72%
15-16 years (Fund 40)	90,806,189	7.12%	1,639,466	2,063,002	87,103,721	7.04%
17-18 years (Fund 30)	70,956,862	5.57%	1,184,693	1,500,564	68,271,605	5.52%
19+ years (Fund 20)	63,750,243	5.00%	5,158,928	1,133,735	57,457,580	4.64%
Moderate	\$365,244,788	28.66%	\$1,319,908	\$7,754,546	\$356,170,335	28.79%
0-2 years (Fund 90)	5,980,172	0.47%	(227,211)	169,469	6,037,914	0.49%
3-5 years (Fund 80)	14,606,613	1.15%	(1,038,262)	418,847	15,226,028	1.23%
6-8 years (Fund 70)	29,674,213	2.33%	(1,039,853)	763,987	29,950,079	2.42%
9-10 years (Fund 60)	27,872,686	2.19%	85,879	687,255	27,099,551	2.19%
11-12 years (Fund 50)	37,189,942	2.92%	55,683	936,541	36,197,717	2.93%
13-14 years (Fund 40)	47,388,992	3.72%	(1,101,908)	1,092,660	47,398,240	3.83%
15-16 years (Fund 30)	70,267,696	5.51%	(451,737)	1,495,085	69,224,347	5.60%
17-18 years (Fund 20)	63,853,976	5.01%	350,425	1,165,678	62,337,874	5.04%
19+ years (Fund 10)	68,410,500	5.37%	4,686,892	1,025,023	62,698,585	5.07%
Conservative	\$33,100,007	2.60%	\$326,035	\$533,332	\$32,240,640	2.61%
0-2 years (Fund 80)	311,685	0.02%	(54,591)	9,331	356,944	0.03%
3-5 years (Fund 70)	618,196	0.05%	(87,214)	18,055	687,354	0.06%
6-8 years (Fund 60)	1,345,186	0.11%	(9,134)	31,276	1,323,044	0.11%
9-10 years (Fund 50)	1,035,776	0.08%	(71,223)	26,003	1,080,996	0.09%
11-12 years (Fund 40)	2,036,258	0.16%	(258,767)	51,505	2,243,519	0.18%
13-14 years (Fund 30)	3,971,707	0.31%	319,830	82,028	3,569,849	0.29%
15-16 years (Fund 20)	5,154,187	0.40%	(400,372)	96,423	5,458,136	0.44%
17-18 years (Fund 10)	6,556,706	0.51%	252,750	101,521	6,202,434	0.50%
19+ years (F.I.)	12,070,308	0.95%	634,754	117,189	11,318,364	0.91%
Target Portfolios	\$126,932,525	9.96%	\$890,963	\$3,425,035	\$122,616,527	9.91%
Target Fund 100 Portfolio	58,590,659	4.60%	495,472	1,717,723	56,377,464	4.56%
Target Fund 80 Portfolio	34,293,146	2.69%	(1,069,485)	949,272	34,413,359	2.78%
Target Fund 60 Portfolio	20,216,783	1.59%	(70,711)	503,273	19,784,221	1.60%
Target Fund 40 Portfolio	8,556,537	0.67%	1,522,193	180,963	6,853,380	0.55%
Target Fund 20 Portfolio	3,667,732	0.29%	28,679	57,805	3,581,248	0.29%
Target Fund Fixed Income Portfolio	1,607,668	0.13%	(15,184)	15,997	1,606,855	0.13%

Market values provided by Union Bank & Trust.

Investment Fund Balances

The table below compares the fund's investment fund balances as of June 30, 2019 with that of March 31, 2019. The change in asset distribution is broken down into the dollar change due to Net New Investment and the dollar change due to Investment Return.

Asset Distribution Across Investment Funds

	June 30, 2019			March 31, 2019		
	Market Value	Weight	Net New Inv.	Inv. Return	Market Value	Weight
Individual Funds	\$298,185,586	23.39%	\$3,378,906	\$7,759,142	\$287,047,538	23.20%
Money Market	\$20,623,284	1.62%	\$1,697,733	\$(0)	\$18,925,551	1.53%
State Street US Govt MM	20,623,284	1.62%	1,697,733	(0)	18,925,551	1.53%
Fixed Income	\$40,359,301	3.17%	\$790,270	\$724,953	\$38,844,077	3.14%
PIMCO Short-Term	14,741,991	1.16%	430,624	54,718	14,256,649	1.15%
Amer Cent Short Dur Infl Prot Bond	2,122,519	0.17%	(45,880)	34,686	2,133,712	0.17%
BlackRock Infl Protected Bond	2,161,438	0.17%	(25,451)	50,101	2,136,788	0.17%
Fidelity Investment Grade Bond	2,652,393	0.21%	324,141	76,726	2,251,526	0.18%
Northern Funds Bond Index	12,706,836	1.00%	(117,650)	368,645	12,455,841	1.01%
MainStay Total Return Bond	2,111,244	0.17%	148,360	55,731	1,907,153	0.15%
Touchstone High Yield	2,526,214	0.20%	57,681	66,121	2,402,412	0.19%
Templeton International Bond	1,336,667	0.10%	18,445	18,227	1,299,996	0.11%
Balanced	\$50,632,110	3.97%	\$316,532	\$1,547,333	\$48,768,245	3.94%
T. Rowe Price Balanced	50,632,110	3.97%	316,532	1,547,333	48,768,245	3.94%
Domestic Equity	\$150,182,195	11.78%	\$93,097	\$4,586,502	\$145,502,597	11.76%
T. Rowe Large Cap Growth	33,796,677	2.65%	236,663	919,919	32,640,096	2.64%
American Century Equity Growth	6,655,847	0.52%	9,761	218,948	6,427,138	0.52%
Northern Stock Index	26,674,037	2.09%	394,808	1,054,635	25,224,594	2.04%
DFA US Large Cap Value	33,135,726	2.60%	(548,471)	960,284	32,723,913	2.65%
Northern Mid-Cap Index	25,121,802	1.97%	(14,286)	688,793	24,447,295	1.98%
T. Rowe Price QM Small Cap Growth	6,653,915	0.52%	22,394	326,766	6,304,755	0.51%
Northern Small Cap Index	7,201,920	0.57%	113,590	129,193	6,959,137	0.56%
William Blair Small Cap Value	10,942,271	0.86%	(121,363)	287,964	10,775,670	0.87%
International Equity	\$31,157,121	2.44%	\$432,266	\$845,498	\$29,879,356	2.42%
Northern Int'l Equity Index	10,045,154	0.79%	218,012	333,345	9,493,797	0.77%
Neuberger Berman Int'l Lrg Cp	10,496,313	0.82%	33,291	336,836	10,126,187	0.82%
DFA Int'l Small Company	2,694,930	0.21%	59,372	52,687	2,582,871	0.21%
Lazard Emerging Markets	0	0.00%	(7,989,354)	312,853	7,676,501	0.62%
Vanguard Emerging Markets Select Stock	7,920,723	0.62%	8,110,945	(190,222)	-	-
Real Estate	\$4,348,818	0.34%	\$35,057	\$69,666	\$4,244,096	0.34%
Voya Global Real Estate	0	0.00%	(741,659)	(3,796)	745,455	0.06%
Principal Global Real Estate	759,411	0.06%	746,036	13,374	-	-
T. Rowe Price Real Estate	0	0.00%	(3,500,934)	2,293	3,498,641	0.28%
DFA Real Estate	3,589,408	0.28%	3,531,614	57,794	-	-
Commodities	\$882,757	0.07%	\$13,951	\$(14,810)	\$883,616	0.07%
Credit Suisse Commodities	882,757	0.07%	13,951	(14,810)	883,616	0.07%
Total Plan	\$1,274,606,806	100.0%	\$7,461,179	\$30,094,668	\$1,237,050,960	100.0%

Market values provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter	Last Year	Last 3 Years	Last 5 Years	Last 7 Years					
Target Portfolios										
Target Fund 100										
Target Fund 100 Portfolio	3.12%	50	3.33%	84	11.10%	14	6.09%	41	9.89%	20
Target Fund 100 Blended Benchmark	3.16%	48	4.94%	58	11.41%	11	6.72%	20	10.41%	14
MS 529 Static Alloc 70-85	3.11%		5.26%		9.71%		5.96%		9.11%	
Aggressive Age Based 0-2 yrs (Fd 100)	3.12%	56	3.33%	88	-	-	-	-	-	-
Target Fund 100 Blended Benchmark	3.16%	50	4.94%	52	11.41%	15	6.72%	25	10.41%	23
MS 529 Age 0-4 Grp	3.15%		5.01%		9.72%		5.98%		9.14%	
Target Fund 90										
Aggressive Age Based 3-5 yrs (Fd 90)	2.98%	82	3.71%	94	-	-	-	-	-	-
Target Fund 90 Blended Benchmark	3.19%	70	4.91%	83	10.52%	11	6.34%	34	9.89%	15
MS 529 Age 5-6 Grp	3.33%		6.00%		9.28%		5.98%		8.68%	
Moderate Age Based 0-2 yrs (Fd 90)	2.98%	70	3.71%	81	-	-	-	-	-	-
Target Fund 90 Blended Benchmark	3.19%	48	4.91%	52	10.52%	29	6.34%	38	9.89%	31
MS 529 Age 0-4 Grp	3.15%		5.01%		9.72%		5.98%		9.14%	
Target Fund 80										
Target Fund 80 Portfolio	2.90%	67	3.99%	79	9.65%	53	5.40%	66	8.39%	73
Target Fund 80 Blended Benchmark	3.11%	50	5.45%	47	9.61%	54	5.82%	53	8.72%	64
MS 529 Static Alloc 70-85	3.11%		5.26%		9.71%		5.96%		9.11%	
Aggressive Age Based 6-8 yrs (Fd 80)	2.90%	70	3.99%	87	-	-	-	-	-	-
Target Fund 80 Blended Benchmark	3.11%	51	5.45%	53	9.61%	21	5.82%	39	8.72%	37
MS 529 Age 7-8 Grp	3.12%		5.58%		8.66%		5.48%		8.33%	
Moderate Age Based 3-5 yrs (Fd 80)	2.90%	87	3.99%	93	-	-	-	-	-	-
Target Fund 80 Blended Benchmark	3.11%	75	5.45%	65	9.61%	40	5.82%	53	8.72%	48
MS 529 Age 5-6 Grp	3.33%		6.00%		9.28%		5.98%		8.68%	
Conserv. Age Based 0-2 yrs (Fd 80)	2.90%	76	3.99%	73	-	-	-	-	-	-
Target Fund 80 Blended Benchmark	3.11%	56	5.45%	43	9.61%	56	5.82%	58	8.72%	58
MS 529 Age 0-4 Grp	3.15%		5.01%		9.72%		5.98%		9.14%	
Target Fund 70										
Aggressive Age Based 9-10 yrs (Fd 70)	2.68%	79	4.09%	87	-	-	-	-	-	-
Target Fund 70 Blended Benchmark	2.96%	57	5.59%	48	8.75%	16	5.65%	26	8.36%	14
MS 529 Age 9-10 Grp	3.03%		5.50%		7.69%		4.91%		7.22%	
Moderate Age Based 6-8 yrs (Fd 70)	2.68%	91	4.09%	84	-	-	-	-	-	-
Target Fund 70 Blended Benchmark	2.96%	67	5.59%	50	8.75%	48	5.65%	45	8.36%	49
MS 529 Age 7-8 Grp	3.12%		5.58%		8.66%		5.48%		8.33%	
Conserv. Age Based 3-5 yrs (Fd 70)	2.68%	93	4.09%	93	-	-	-	-	-	-
Target Fund 70 Blended Benchmark	2.96%	83	5.59%	62	8.75%	66	5.65%	66	8.36%	58
MS 529 Age 5-6 Grp	3.33%		6.00%		9.28%		5.98%		8.68%	

Performance is net of all fees, including 529 program management fees (32 bps) and state administration fees (10 bps).
Performance figures provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter	Last Year	Last 3 Years	Last 5 Years	Last 7 Years					
Target Fund 60										
Target Fund 60 Portfolio	2.63%	85	4.44%	78	7.83%	58	4.55%	72	6.74%	77
Target Fund 60 Blended Benchmark	2.97%	66	5.77%	48	7.80%	59	4.94%	60	7.04%	71
MS 529 Static Alloc 50-70	3.18%		5.67%		8.11%		5.25%		7.76%	
Aggressive Age Based 11-12 yrs (Fd 60)	2.63%	68	4.44%	80	-	-	-	-	-	-
Target Fund 60 Blended Benchmark	2.97%	44	5.77%	50	7.80%	21	4.94%	35	7.04%	22
MS 529 Age 11-12 Grp	2.87%		5.76%		7.11%		4.54%		6.38%	
Moderate Age Based 9-10 yrs (Fd 60)	2.63%	85	4.44%	80	-	-	-	-	-	-
Target Fund 60 Blended Benchmark	2.97%	55	5.77%	46	7.80%	45	4.94%	47	7.04%	57
MS 529 Age 9-10 Grp	3.03%		5.50%		7.69%		4.91%		7.22%	
Conserv. Age Based 6-8 yrs (Fd 60)	2.63%	94	4.44%	77	-	-	-	-	-	-
Target Fund 60 Blended Benchmark	2.97%	65	5.77%	48	7.80%	73	4.94%	76	7.04%	84
MS 529 Age 7-8 Grp	3.12%		5.58%		8.66%		5.48%		8.33%	
Target Fund 50										
Aggressive Age Based 13-14 yrs (Fd 50)	2.67%	53	5.12%	58	-	-	-	-	-	-
Target Fund 50 Blended Benchmark	2.97%	35	6.25%	32	7.25%	12	4.93%	16	6.84%	11
MS 529 Age 13-14 Grp	2.70%		5.41%		6.13%		3.81%		5.37%	
Moderate Age Based 11-12 yrs (Fd 50)	2.67%	65	5.12%	60	-	-	-	-	-	-
Target Fund 50 Blended Benchmark	2.97%	44	6.25%	38	7.25%	45	4.93%	36	6.84%	33
MS 529 Age 11-12 Grp	2.87%		5.76%		7.11%		4.54%		6.38%	
Conserv. Age Based 9-10 yrs (Fd 50)	2.67%	80	5.12%	59	-	-	-	-	-	-
Target Fund 50 Blended Benchmark	2.97%	56	6.25%	32	7.25%	65	4.93%	47	6.84%	59
MS 529 Age 9-10 Grp	3.03%		5.50%		7.69%		4.91%		7.22%	
Target Fund 40										
Target Fund 40 Portfolio	2.44%	65	4.99%	66	6.15%	48	3.91%	55	5.25%	68
Target Fund 40 Blended Benchmark	2.82%	42	6.21%	34	5.99%	54	4.17%	46	5.44%	61
MS 529 Static Alloc 30-50	2.71%		5.58%		6.11%		3.97%		5.67%	
Aggressive Age Based 15-16 yrs (Fd 40)	2.44%	47	4.99%	59	-	-	-	-	-	-
Target Fund 40 Blended Benchmark	2.82%	28	6.21%	29	5.99%	17	4.17%	25	5.44%	12
MS 529 Age 15-16 Grp	2.39%		5.28%		4.67%		3.27%		3.91%	
Moderate Age Based 13-14 yrs (Fd 40)	2.44%	65	4.99%	61	-	-	-	-	-	-
Target Fund 40 Blended Benchmark	2.82%	43	6.21%	33	5.99%	57	4.17%	37	5.44%	48
MS 529 Age 13-14 Grp	2.70%		5.41%		6.13%		3.81%		5.37%	
Conserv. Age Based 11-12 yrs (Fd 40)	2.44%	82	4.99%	62	-	-	-	-	-	-
Target Fund 40 Blended Benchmark	2.82%	55	6.21%	39	5.99%	75	4.17%	69	5.44%	69
MS 529 Age 11-12 Grp	2.87%		5.76%		7.11%		4.54%		6.38%	
Target Fund 30										
Aggressive Age Based 17-18 yrs (Fd 30)	2.24%	39	4.70%	57	-	-	-	-	-	-
Target Fund 30 Blended Benchmark	2.49%	29	5.64%	31	5.15%	9	3.63%	18	4.69%	6
MS 529 Age 17-18 Grp	2.10%		5.06%		4.03%		2.82%		3.33%	
Moderate Age Based 15-16 yrs (Fd 30)	2.24%	57	4.70%	63	-	-	-	-	-	-
Target Fund 30 Blended Benchmark	2.49%	46	5.64%	45	5.15%	35	3.63%	42	4.69%	25
MS 529 Age 15-16 Grp	2.39%		5.28%		4.67%		3.27%		3.91%	
Conserv. Age Based 13-14 yrs (Fd 30)	2.24%	76	4.70%	67	-	-	-	-	-	-
Target Fund 30 Blended Benchmark	2.49%	63	5.64%	44	5.15%	72	3.63%	59	4.69%	68
MS 529 Age 13-14 Grp	2.70%		5.41%		6.13%		3.81%		5.37%	

Performance is net of all fees, including 529 program management fees (32 bps) and state administration fees (10 bps). Performance figures provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
Target Fund 20										
Target Fund 20 Portfolio	1.92%	82	4.54%	72	4.20%	52	2.92%	61	3.48%	62
Target Fund 20 Blended Benchmark	2.23%	65	5.43%	62	4.10%	62	3.05%	55	3.56%	52
MS 529 Static Alloc 15-30	2.51%		5.99%		4.21%		3.08%		3.67%	
Aggressive Age Based 19+ yrs (Fd 20)										
Target Fund 20 Blended Benchmark	2.23%	15	5.43%	16	4.10%	8	3.05%	12	3.56%	7
MS 529 Age 19+ Grp	1.64%		3.99%		2.23%		1.63%		1.65%	
Moderate Age Based 17-18 yrs (Fd 20)										
Target Fund 20 Blended Benchmark	2.23%	40	5.43%	39	4.10%	49	3.05%	37	3.56%	37
MS 529 Age 17-18 Grp	2.10%		5.06%		4.03%		2.82%		3.33%	
Conserv. Age Based 15-16 yrs (Fd 20)										
Target Fund 20 Blended Benchmark	2.23%	58	5.43%	48	4.10%	62	3.05%	59	3.56%	53
MS 529 Age 15-16 Grp	2.39%		5.28%		4.67%		3.27%		3.91%	
Target Fund 10										
Moderate Age Based 19+ yrs (Fd 10)										
Target Fund 10 Blended Benchmark	1.88%	36	4.74%	29	3.01%	34	2.32%	30	2.55%	27
MS 529 Age 19+ Grp	1.64%		3.99%		2.23%		1.63%		1.65%	
Conserv. Age Based 17-18 yrs (Fd 10)										
Target Fund 10 Blended Benchmark	1.88%	66	4.74%	55	3.01%	80	2.32%	74	2.55%	68
MS 529 Age 17-18 Grp	2.10%		5.06%		4.03%		2.82%		3.33%	
Target Fund Fixed Income										
Target Fund Fixed Income Portfolio	1.09%	72	2.78%	77	1.36%	80	0.93%	74	0.67%	84
Target Fund F.I. Blended Benchmark	0.95%	74	2.86%	76	1.48%	74	1.03%	71	0.75%	82
MS 529 Static Short-Term	1.57%		4.23%		1.98%		1.46%		1.63%	
Conserv. Age Based 19+ yrs (F.I.)										
Target Fund F.I. Blended Benchmark	0.95%	88	2.86%	79	1.48%	80	1.03%	76	0.75%	83
MS 529 Age 19+ Grp	1.64%		3.99%		2.23%		1.63%		1.65%	

Performance is net of all fees, including 529 program management fees (32 bps) and state administration fees (10 bps). Performance figures provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
Individual Funds Portfolios										
Money Market Funds										
State Street US Govt MM (net all)*	0.53%	66	1.91%	76	-		-		-	
State Street US Govt MM (net mgr)	0.60%	31	2.18%	39	1.28%	36	0.79%	35	0.57%	34
3 Month Treasury Bill	0.64%	23	2.31%	26	1.38%	30	0.87%	28	0.65%	24
Callan Money Market Funds	0.56%		2.08%		1.18%		0.71%		0.51%	
Fixed Income Funds										
PIMCO Short-Term (net all)*	0.45%	98	1.63%	100	2.11%	40	1.49%	71	1.41%	71
PIMCO Short-Term (net mgr)	0.50%	98	2.03%	100	2.50%	9	1.90%	25	1.82%	43
3 Month T-Bills	0.61%	98	2.30%	99	1.36%	88	0.84%	96	0.62%	96
Blmbg Aggregate 1-3 Index	1.49%	42	4.28%	45	1.61%	70	1.47%	71	1.32%	72
Callan Short Term FI MFs	1.47%		4.18%		2.02%		1.71%		1.60%	
Amer Cent Short Dur Infl Prot (net all)*	1.66%	92	2.76%	93	1.35%	96	0.59%	92	-	
Amer Cent Short Dur Infl Prot (net mgr)	1.77%	87	3.19%	87	1.77%	81	1.00%	84	0.90%	57
Blmbg US TIPS 0-5 Index	1.65%	92	3.22%	87	1.64%	84	0.92%	89	0.88%	60
Callan TIPS MFs	2.66%		4.37%		2.06%		1.36%		0.96%	
BlackRock Infl Protected Bond (net all)	2.46%	63	3.42%	85	1.42%	95	0.71%	92	0.41%	97
BlackRock Infl Protected Bond (net mgr)	2.54%	58	3.95%	74	1.85%	70	1.14%	72	0.83%	66
Blmbg US TIPS Index	2.86%	19	4.84%	19	2.08%	47	1.76%	18	1.17%	27
Callan TIPS MFs	2.66%		4.37%		2.06%		1.36%		0.96%	
Fidelity Investment Grade Bond (net all)	3.12%	44	7.89%	35	2.70%	41	2.63%	93	-	
Fidelity Investment Grade Bond (net mgr)	3.25%	18	8.37%	12	3.12%	16	3.05%	27	2.91%	35
Blmbg Aggregate Index	3.08%	50	7.87%	39	2.31%	77	2.95%	37	2.62%	69
Callan Core Bond MFs	3.08%		7.80%		2.53%		2.91%		2.77%	
Northern Funds Bond Index (net all)*	3.06%	51	7.23%	99	1.69%	100	2.38%	99	2.05%	97
Northern Funds Bond Index (net mgr)	3.14%	37	7.78%	61	2.15%	83	2.83%	60	2.48%	83
Blmbg Aggregate Index	3.08%	50	7.87%	39	2.31%	77	2.95%	37	2.62%	69
Callan Core Bond MFs	3.08%		7.80%		2.53%		2.91%		2.77%	
MainStay Total Return Bond (net all)*	2.94%	75	7.07%	87	2.63%	84	-		-	
MainStay Total Return Bond (net mgr)	2.97%	74	7.40%	80	2.99%	61	2.61%	89	3.00%	77
Blmbg Aggregate Index	3.08%	57	7.87%	48	2.31%	95	2.95%	65	2.62%	95
Callan Core Plus MFs	3.16%		7.85%		3.20%		3.19%		3.35%	
Touchstone High Yield (net all)*	2.72%	38	7.93%	27	6.23%	85	3.17%	85	-	
Touchstone High Yield (net mgr)	2.83%	31	8.40%	21	6.66%	61	3.60%	69	5.19%	90
High Yield II Index	2.57%	52	7.58%	39	7.54%	13	4.70%	13	6.37%	18
Callan High Yield MFs	2.58%		7.00%		6.76%		3.84%		5.72%	
Templeton International Bond (net all)*	1.43%	86	6.78%	35	4.25%	18	0.22%	71	-	
Templeton International Bond (net mgr)	1.53%	83	7.28%	30	4.70%	15	0.65%	57	2.18%	45
FTSE WGBI Non-US Index	3.93%	13	4.54%	70	0.83%	84	0.19%	72	0.51%	78
Intl Income MFs	2.97%		6.43%		2.13%		0.88%		2.07%	
Balanced Funds										
T. Rowe Price Balanced (net all)	3.29%	64	6.40%	66	9.48%	33	6.05%	56	8.65%	57
T. Rowe Price Balanced (net mgr)	3.35%	64	6.66%	60	9.76%	30	6.39%	50	9.03%	50
Balanced Fund Blended Benchmark	3.79%	39	8.77%	32	9.47%	33	7.01%	30	9.21%	43
Callan Dom Balanced MFs	3.67%		7.17%		9.03%		6.39%		9.04%	
Domestic Equity Funds										
T. Rowe Large Cap Growth (net all)*	2.89%	94	9.53%	68	22.65%	5	14.68%	13	17.53%	6
T. Rowe Large Cap Growth (net mgr)	3.00%	91	9.96%	63	23.13%	3	15.13%	6	17.99%	3
Russell 1000 Growth Index	4.64%	56	11.56%	44	18.07%	59	13.39%	40	15.76%	37
Callan Large Cap Grwth MF	4.86%		11.03%		18.85%		13.05%		15.47%	
American Century Equity Growth (net all)	3.48%	75	6.95%	62	13.27%	54	8.27%	77	12.21%	77
American Century Equity Growth (net mgr)	3.61%	71	7.41%	58	13.73%	38	8.75%	59	12.72%	58
S&P 500	4.30%	42	10.42%	32	14.19%	26	10.71%	20	13.98%	20
Callan Large Cap Core MFs	4.13%		8.54%		13.33%		9.55%		13.03%	
Northern Stock Index (net all)*	4.22%	44	9.88%	39	13.63%	40	10.16%	29	13.42%	40
Northern Stock Index (net mgr)	4.29%	43	10.32%	34	14.08%	29	10.61%	20	13.86%	24
S&P 500	4.30%	42	10.42%	32	14.19%	26	10.71%	20	13.98%	20
Callan Large Cap Core MFs	4.13%		8.54%		13.33%		9.55%		13.03%	

(net all) indicates performance is net of all fees, including 529 program management fees (32 bps) and state administration fees (10 bps). (net mgr) performance figures provided by Union Bank & Trust.

(net mgr) indicates performance is net of manager fees.

* Indicates fund is held in the Age Based and Target Fund Portfolios.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
DFA US Large Cap Value (net all)*	2.98%	58	2.57%	76	-		-		-	
DFA US Large Cap Value (net mgr)	3.09%	57	2.96%	75	11.10%	53	7.15%	50	13.30%	15
Russell 1000 Value Index	3.84%	46	8.46%	35	10.19%	73	7.46%	48	12.09%	40
Callan Lg Cap Value MF	3.67%		5.83%		11.17%		7.21%		11.81%	
Northern Mid Cap Index (net all)*	2.89%	81	0.77%	77	10.27%	62	7.39%	55	12.03%	56
Northern Mid Cap Index (net mgr)	3.01%	81	1.18%	76	10.72%	60	7.85%	53	12.49%	47
S&P Mid Cap 400 Index	3.05%	80	1.36%	75	10.90%	58	8.02%	53	12.68%	46
Callan Mid Cap MFs	5.33%		8.77%		13.11%		8.69%		12.29%	
T Rowe Price QM Sm Cap Growth (net all)*	5.26%	30	6.58%	30	-		-		-	
T Rowe Price QM Sm Cap Growth (net mgr)	5.38%	29	6.99%	29	-		-		-	
Russell 2000 Growth Index	2.75%	58	(0.49%)	55	14.69%	42	8.63%	45	12.87%	43
Callan Small Cap MFs	3.20%		0.83%		12.76%		7.60%		12.14%	
Northern Small Cap Index (net all)	1.95%	73	(3.83%)	63	11.71%	57	6.50%	61	11.06%	68
Northern Small Cap Index (net mgr)	2.03%	71	(3.42%)	63	12.16%	55	6.93%	60	11.50%	62
Russell 2000 Index	2.10%	70	(3.31%)	63	12.30%	53	7.06%	57	11.63%	59
Callan Small Cap MFs	3.20%		0.83%		12.76%		7.60%		12.14%	
William Blair Small Cap Value (net all)	2.75%	39	(3.51%)	37	7.30%	82	4.71%	64	9.72%	74
William Blair Small Cap Value (net mgr)	2.85%	36	(3.10%)	36	7.74%	75	5.14%	51	10.18%	69
Russell 2000 Value Index	1.38%	66	(6.24%)	61	9.81%	41	5.39%	42	10.31%	62
Callan Sm Cap Value MF	2.15%		(5.25%)		9.04%		5.16%		10.62%	
International Equity										
Northern Int'l Equity Index (net all)*	3.54%	41	0.73%	38	8.44%	51	1.75%	60	6.73%	58
Northern Int'l Equity Index (net mgr)	3.63%	41	1.10%	36	8.85%	43	2.14%	51	7.14%	46
MSCI EAFE Index	3.68%	40	1.08%	36	9.11%	40	2.25%	50	7.31%	42
Callan Non US Equity MFs	3.34%		(0.22%)		8.51%		2.29%		7.00%	
Neuberger Berman Int'l Lrg Cp (net all)*	3.41%	49	(0.32%)	51	8.22%	54	2.84%	43	6.55%	62
Neuberger Berman Int'l Lrg Cp (net mgr)	3.53%	42	0.09%	47	8.66%	47	3.27%	32	6.99%	51
MSCI EAFE Index	3.68%	40	1.08%	36	9.11%	40	2.25%	50	7.31%	42
Callan Non US Equity MFs	3.34%		(0.22%)		8.51%		2.29%		7.00%	
DFA Int'l Small Company (net all)*	2.06%	63	(7.75%)	66	7.45%	65	2.52%	65	-	
DFA Int'l Small Company (net mgr)	2.18%	58	(7.34%)	58	7.91%	55	2.98%	51	8.81%	47
MSCI World Small Cap ex US	1.76%	70	(6.17%)	46	8.38%	47	3.39%	43	8.79%	48
Callan Intl Small Cap MFs	2.60%		(6.81%)		8.27%		2.99%		8.78%	
Vanguard EM Select Stock (net mgr)	1.06%	60	6.17%	16	11.82%	25	2.41%	59	5.05%	42
FTSE Emerging Index	1.35%	58	4.41%	26	10.66%	45	3.23%	42	4.77%	45
Callan Emerging Equity MF	1.78%		1.60%		9.81%		2.81%		4.14%	
Real Estate										
Principal Global Real Estate (net mgr)	1.45%	31	10.89%	20	7.08%	25	-		-	
FTSE EPRA/NAREIT Dev REIT	(0.07%)	76	7.68%	63	4.46%	82	4.85%	61	7.26%	61
Callan Gbl Real Estate MF	0.96%		8.71%		5.82%		5.06%		7.65%	
DFA Real Estate (net mgr)	1.74%	69	14.29%	15	5.31%	34	8.68%	19	9.27%	21
Dow Jones U.S. Select REIT Index	0.82%	92	9.75%	73	3.73%	67	7.61%	48	8.41%	49
Callan Real Estate MFs	2.24%		11.17%		4.41%		7.51%		8.37%	
Commodities										
Credit Suisse Commodities (net all)*	(1.62%)	65	(7.66%)	51	(2.68%)	79	(9.52%)	80	-	
Credit Suisse Commodities (net mgr)	(1.44%)	57	(7.11%)	39	(2.30%)	69	(9.12%)	69	(6.79%)	65
Bloomberg Commodity Total Return	(1.19%)	36	(6.75%)	30	(2.18%)	66	(9.15%)	70	(6.68%)	63
Callan Cmnties Genl MF	(1.37%)		(7.60%)		(1.57%)		(8.20%)		(5.97%)	

(net all) indicates performance is net of all fees, including 529 program management fees (32 bps) and state administration fees (10 bps). (net mgr) performance figures provided by Union Bank & Trust.

(net mgr) indicates performance is net of manager fees.

* Indicates fund is held in the Age Based and Target Fund Portfolios.

Alabama CollegeCounts Advisor Plan, Executive Summary
Investment Manager Performance Monitoring Summary Report
June 30, 2019

Investment Manager	Last Quarter Return	Last Year Return	3 Year Return	5 Year Return	7 Year Return	7 Year Risk Quadrant	7 Year Return Consistency	7 Year Excess Rtn Ratio	7 Year Sharpe Ratio
Money Market Funds									
State Street US Govt MM Callan Money Market Funds	0.6 31	2.2 39	1.3 36	0.8 35	0.6 34			-3.0 96	-0.2 35
3 Month Treasury Bill	0.6 23	2.3 26	1.4 30	0.9 28	0.6 24				0.0 24
Fixed Income Funds									
PIMCO Short-Term Callan Defensive FI MFs	0.5 98	2.0 100	2.5 9	1.9 25	1.8 43			1.2 34	1.2 20
3 Month T-Bills	0.6 98	2.3 99	1.4 88	0.8 96	0.6 96				-0.1 96
Amer Cent Short Dur Infl Prot Bond Callan TIPS MFs	1.8 87	3.2 87	1.8 81	1.0 84	0.9 57			0.0 47	0.1 30
Blmbg US TIPS 0-5 Index	1.6 92	3.2 87	1.6 84	0.9 89	0.9 60				0.1 23
BlackRock Infl Protected Bond Callan TIPS MFs	2.5 58	3.9 74	1.9 70	1.1 72	0.8 66			-0.6 78	0.0 68
Blmbg US TIPS Index	2.9 19	4.8 19	2.1 47	1.8 18	1.2 27				0.1 25
Fidelity Investment Grade Bond Callan Core Bond MFs	3.2 18	8.4 12	3.1 16	3.1 27	2.9 35			0.3 43	0.7 53
Blmbg Aggregate Index	3.1 50	7.9 39	2.3 77	2.9 37	2.6 69				0.6 60
Northern Funds Bond Index (i) Callan Core Bond MFs	3.1 37	7.8 61	2.1 83	2.8 60	2.5 83			-1.4 100	0.6 88
Blmbg Aggregate Index	3.1 50	7.9 39	2.3 77	2.9 37	2.6 69				0.6 60
MainStay Total Return Bond Callan Core Plus MFs	3.0 74	7.4 80	3.0 61	2.6 89	3.0 77			0.3 80	0.7 79
Blmbg Aggregate Index	3.1 57	7.9 48	2.3 95	2.9 65	2.6 95				0.6 90
Touchstone High Yield Callan High Yield MFs	2.8 31	8.4 21	6.7 61	3.6 69	5.2 90			-1.1 85	0.8 83
High Yield II Index	2.6 52	7.6 39	7.5 13	4.7 13	6.4 18				1.0 40
Templeton International Bond Intl Income MFs	1.5 83	7.3 30	4.7 15	0.7 57	2.2 45			0.2 70	0.3 48
FTSE WGBI Non-US Index	3.9 13	4.5 70	0.8 84	0.2 72	0.5 78				-0.0 78

Returns:
■ above median
■ third quartile
■ fourth quartile

Risk Quadrant:

Return
Risk

Return Consistency:
■ above median
■ third quartile
■ fourth quartile

Excess Return Ratio:
■ above median
■ third quartile
■ fourth quartile

Sharpe Ratio:
■ above median
■ third quartile
■ fourth quartile

(i) - Indexed scoring method used. Green: manager & index ranking differ by <= +/- 10%tile. Yellow: manager & index ranking differ by <= +/- 20%tile. Red: manager & index ranking differ by > +/- 20%tile.

Alabama CollegeCounts Advisor Plan, Executive Summary
Investment Manager Performance Monitoring Summary Report
June 30, 2019

Investment Manager	Last Quarter Return	Last Year Return	3 Year Return	5 Year Return	7 Year Return	7 Year Risk Quadrant	7 Year Return Consistency	7 Year Excess Rtn Ratio	7 Year Sharpe Ratio
Balanced Funds									
T. Rowe Price Balanced Callan Dom Balanced MFs	3.4 64	6.7 60	9.8 30	6.4 50	9.0 50			-0.1 74	1.2 61
Balanced Fund Blended Benchmark	3.8 39	8.8 32	9.5 33	7.0 30	9.2 43				1.3 44
Domestic Equity Funds									
T. Rowe Large Cap Growth Callan Large Cap Grwth MF	3.0 91	10.0 63	23.1 3	15.1 6	18.0 3			0.5 7	1.4 7
Russell 1000 Growth Index	4.6 56	11.6 44	18.1 59	13.4 40	15.8 37				1.3 23
American Century Equity Growth Callan Large Cap Core MFs	3.6 71	7.4 58	13.7 38	8.8 59	12.7 58			-0.7 70	1.1 61
S&P 500	4.3 42	10.4 32	14.2 26	10.7 20	14.0 20				1.3 11
Northern Stock Index (i) Callan Large Cap Core MFs	4.3 43	10.3 34	14.1 29	10.6 20	13.9 24			-4.0 100	1.3 19
S&P 500	4.3 42	10.4 32	14.2 26	10.7 20	14.0 20				1.3 11
DFA US Large Cap Value Callan Lg Cap Value MF	3.1 57	3.0 75	11.1 53	7.2 50	13.3 15			0.4 12	1.1 35
Russell 1000 Value Index	3.8 46	8.5 35	10.2 73	7.5 48	12.1 40				1.1 31
Northern Funds Mid Cap Index (i) Callan Mid Cap MFs	3.0 81	1.2 76	10.7 60	7.8 53	12.5 47			-2.8 100	1.0 32
S&P Mid Cap 400 Index	3.0 80	1.4 75	10.9 58	8.0 53	12.7 46				1.0 30
T Rowe Price QM Small Cap Growth Callan Small Cap MFs	5.4 29	7.0 29							
Russell 2000 Growth Index	2.7 58	-0.5 55	14.7 42	8.6 45	12.9 43				0.8 50
Northern Small Cap Index (i) Callan Small Cap MFs	2.0 71	-3.4 63	12.2 55	6.9 60	11.5 62			-1.8 100	0.8 57
Russell 2000 Index	2.1 70	-3.3 63	12.3 53	7.1 57	11.6 59				0.8 55
William Blair Small Cap Value Callan Sm Cap Value MF	2.9 36	-3.1 36	7.7 75	5.1 51	10.2 69			-0.0 69	0.7 64
Russell 2000 Value Index	1.4 66	-6.2 61	9.8 41	5.4 42	10.3 62				0.7 64

Returns:
■ above median
■ third quartile
■ fourth quartile



Return Consistency:
■ above median
■ third quartile
■ fourth quartile

Excess Return Ratio:
■ above median
■ third quartile
■ fourth quartile

Sharpe Ratio:
■ above median
■ third quartile
■ fourth quartile

(i) - Indexed scoring method used. Green: manager & index ranking differ by <= +/- 10%tile. Yellow: manager & index ranking differ by <= +/- 20%tile. Red: manager & index ranking differ by > +/- 20%tile.

Alabama CollegeCounts Advisor Plan, Executive Summary
Investment Manager Performance Monitoring Summary Report
June 30, 2019

Investment Manager	Last Quarter Return	Last Year Return	3 Year Return	5 Year Return	7 Year Return	7 Year Risk Quadrant	7 Year Return Consistency	7 Year Excess Rtn Ratio	7 Year Sharpe Ratio
International Equity Funds									
Northern Int'l Equity Index Callan Non US Equity MFs	3.6 41	1.1 36	8.8 43	2.1 51	7.1 46			-0.2 52	0.6 38
MSCI EAFE Index	3.7 40	1.1 36	9.1 40	2.2 50	7.3 42				0.6 35
Neuberger Berman Int'l Lrg Cp Callan Non US Equity MFs	3.5 42	0.1 47	8.7 47	3.3 32	7.0 51			-0.1 48	0.6 46
MSCI EAFE Index	3.7 40	1.1 36	9.1 40	2.2 50	7.3 42				0.6 35
DFA Int'l Small Company Callan Intl Small Cap MFs	2.2 58	-7.3 58	7.9 55	3.0 51	8.8 47			0.0 47	0.6 39
MSCI World Small Cap ex US	1.8 70	-6.2 46	8.4 47	3.4 43	8.8 48				0.6 39
Vanguard EM Select Stock Callan Emerging Equity MF	1.1 60	6.2 16	11.8 25	2.4 59	5.1 42			0.1 40	0.3 40
FTSE Emerging Index	1.3 58	4.4 26	10.7 45	3.2 42	4.8 45				0.3 39
Real Estate Funds									
Principal Global Real Estate Callan Gbl Real Estate MF	1.5 31	10.9 20	7.1 25						
FTSE EPRA/NAREIT Dev REIT	-0.1 76	7.7 63	4.5 82	4.9 61	7.3 61				0.7 65
DFA Real Estate Callan Real Estate MFs	1.7 69	14.3 15	5.3 34	8.7 19	9.3 21			0.7 8	0.7 29
Dow Jones U.S. Select REIT Index	0.8 92	9.8 73	3.7 67	7.6 48	8.4 49				0.6 59
Commodity Funds									
Credit Suisse Commodities Callan Cmties Genl MF	-1.4 57	-7.1 39	-2.3 69	-9.1 69	-6.8 65			-0.2 75	-0.6 78
Bloomberg Commodity Total Return	-1.2 36	-6.8 30	-2.2 66	-9.1 70	-6.7 63				-0.5 72
Underlying Funds									
Northern Small Cap Value Callan Sm Cap Value MF	2.2 49	-4.3 39	8.1 70	5.6 39	10.6 56			0.1 43	0.7 43
Russell 2000 Value Index	1.4 66	-6.2 61	9.8 41	5.4 42	10.3 62				0.7 64

Returns:
■ above median
■ third quartile
■ fourth quartile

Risk Quadrant:

 Return
 Risk

Return Consistency:
■ above median
■ third quartile
■ fourth quartile

Excess Return Ratio:
■ above median
■ third quartile
■ fourth quartile

Sharpe Ratio:
■ above median
■ third quartile
■ fourth quartile

Morningstar Ratings and Rankings

Plan 1 - Advisor - Fund Name	Morningstar Category	Ticker	Morningstar Rating	Market Value*
American Century Equity Growth	Large Blend	AMEIX	3	\$6,664,293
American Century Short Duration Inflation Protection Bond	Inflation-Protected Bond	APISX	3	\$75,749,174
BlackRock Inflation-Protected Bond	Inflation-Protected Bond	BPRIX	3	\$2,151,746
Credit Suisse Commodity Return Strategy	Commodities Broad Basket	CRSOX	4	\$15,367,945
DFA International Small Company	Foreign Small/Mid Blend	DFISX	3	\$13,876,952
DFA U.S. Large Cap Value	Large Value	DFLVX	4	\$97,727,830
DFA Real Estate	Real Estate	DFREX	4	\$3,579,415
Fidelity Advisor Investment Grade Bond	Intermediate-Term Bond	FGBPX	4	\$3,164,104
MainStay Total Return Bond	Intermediate-Term Bond	MTMIX	3	\$100,125,246
Neuberger Berman Int'l Large Cap	Foreign Large Blend	NILIX	3	\$75,947,011
Northern Funds Bond Index	Intermediate-Term Bond	NOBOX	2	\$99,536,127
Northern International Equity Index	Foreign Large Blend	NOINX	3	\$58,645,243
Northern Mid-Cap Index	Mid-Cap Blend	NOMIX	4	\$69,722,685
Northern Small Cap Index	Small Blend	NSIDX	4	\$7,211,855
Northern Small Cap Value (underlying fund)	Small Value	NOSGX	4	\$12,952,098
Northern Stock Index	Large Blend	NOSIX	4	\$114,281,242
PIMCO Short-Term	Ultrashort Bond	PTSHX	5	\$151,317,495
Principal Global Real Estate	Real Estate	PGRSX	4	\$21,267,388
State Street US Govt. Money Market	Money Market	GVMXX	N/A	\$56,849,860
T. Rowe Price Balanced	Moderate Allocation	RPBAX	4	\$56,596,415
T. Rowe Price Large Cap Growth	Large Growth	TRLGX	5	\$105,156,388
T. Rowe Price QM Small Cap Growth	Small Cap Growth	TQAIX	3	\$19,748,186
Templeton International Bond	World Bond	FIBZX	4	\$43,306,397
Touchstone High Yield	High Yield Bond	THIYX	3	\$44,597,913
Vanguard Emerging Markets Select	Emerging Markets	VMMSX	3	\$26,267,388
William Blair Small Cap Value	Small Blend	BVDIX	3	\$10,974,039

*Asset totals include age based, target portfolio assets, advisor and direct plans where applicable.

Summary of Fund Performance Status

Plan 1 - Advisor - Fund Name	Prior Quarter Status	Current Quarter Status	Market Value*
American Century Equity Growth	Watch	Watch	\$6,664,293
American Century Short Duration Inflation Protection Bond	Positive	Positive	\$75,749,174
BlackRock Inflation-Protected Bond	Watch	Watch	\$2,151,746
Credit Suisse Commodity Return Strategy	Positive	Positive	\$15,367,945
DFA International Small Company	Positive	Positive	\$13,876,952
DFA U.S. Large Cap Value	Positive	Positive	\$97,727,830
DFA Real Estate	New Fund	Positive	\$3,579,415
Fidelity Advisor Investment Grade Bond	Positive	Positive	\$3,164,104
MainStay Total Return Bond	Positive	Positive	\$100,125,246
Neuberger Berman Int'l Large Cap	Positive	Positive	\$75,947,011
Northern Funds Bond Index	Positive	Positive	\$99,536,127
Northern International Equity Index	Positive	Positive	\$58,645,243
Northern Mid-Cap Index	Positive	Positive	\$69,722,685
Northern Small Cap Index	Positive	Positive	\$7,211,855
Northern Small Cap Value (underlying fund)	Positive	Positive	\$12,952,098
Northern Stock Index	Positive	Positive	\$114,281,242
PIMCO Short-Term	Positive	Positive	\$151,317,495
Principal Global Real Estate	New Fund	Positive	\$21,267,388
State Street US Govt. Money Market	Positive	Positive	\$56,849,860
T. Rowe Price Balanced	Positive	Positive	\$56,596,415
T. Rowe Price Large Cap Growth	Positive	Positive	\$105,156,388
T. Rowe QM Small Cap Growth	Positive	Positive	\$19,748,186
Templeton International Bond	Positive	Positive	\$43,306,397
Touchstone High Yield	Watch	Watch	\$44,597,913
Vanguard Emerging Markets Select	New Fund	Positive	\$26,267,388
William Blair Small Cap Value	Watch	Watch	\$10,974,039

*Asset totals include age based, target portfolio assets, advisor and direct plans where applicable.

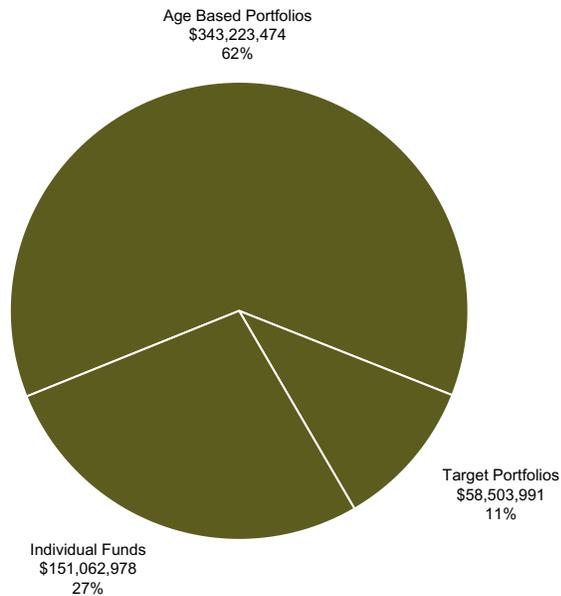
- Funds identified as “Currently on Watch” are those whose Watch status has been approved by the CollegeCounts Board.
- Watch list status based on Watch List guidelines defined in the Investment Policy Statement.

Direct Plan Performance

Changes in Investment Fund Balances Period Ended June 30, 2019

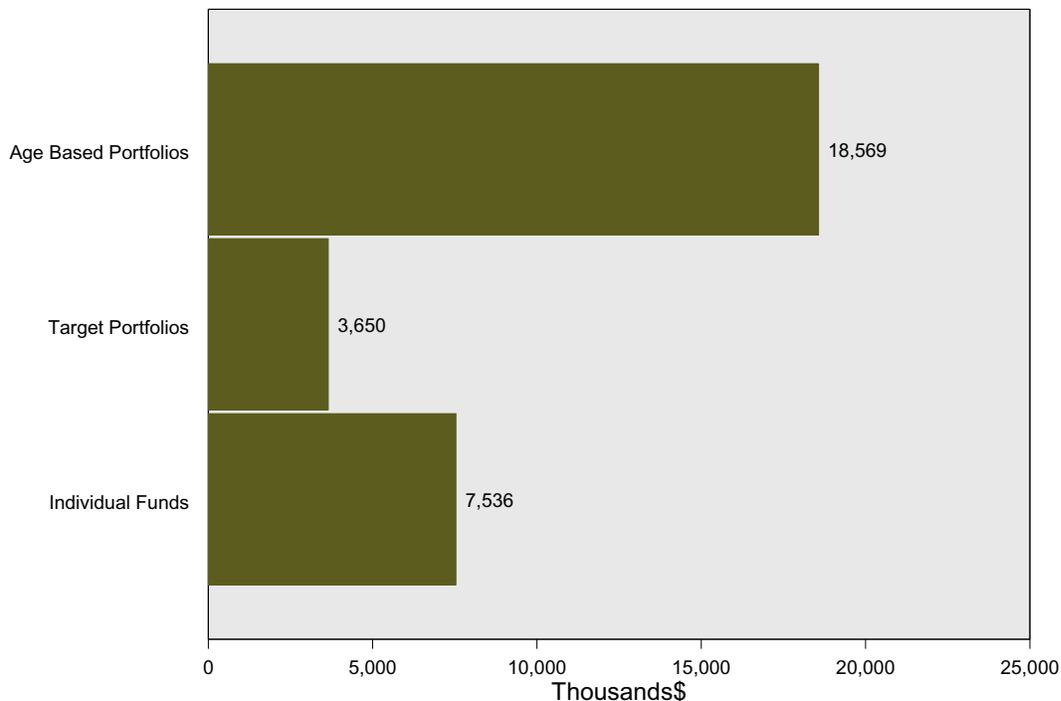
Allocation Across Investment Options

The chart below illustrates the allocation of the aggregate fund assets across the various investment options for the quarter ended June 30, 2019.



Changes in Fund Values

The chart below shows the net change in fund values across the various investment options for the quarter ended June 30, 2019. The change in value for each fund is the result of a combination of 3 factors: 1) market movements; 2) contributions or disbursements into or out of the funds by the participants (and any matching done by the company); and 3) transfers between funds by the participants.



Investment Fund Balances

The table below compares the fund's investment fund balances as of June 30, 2019 with that of March 31, 2019. The change in asset distribution is broken down into the dollar change due to Net New Investment and the dollar change due to Investment Return.

Asset Distribution Across Investment Funds

	June 30, 2019			March 31, 2019		
	Market Value	Weight	Net New Inv.	Inv. Return	Market Value	Weight
Age Based Portfolios	\$343,223,474	62.09%	\$8,877,512	\$9,691,080	\$324,654,881	62.07%
Aggressive	\$186,971,757	33.82%	\$2,653,416	\$5,514,939	\$178,803,402	34.19%
0-2 years (Fund 100)	8,186,622	1.48%	(381,150)	206,754	8,361,018	1.60%
3-5 years (Fund 90)	23,009,285	4.16%	337,861	758,763	21,912,661	4.19%
6-8 years (Fund 80)	29,618,271	5.36%	(260,015)	959,021	28,919,265	5.53%
9-10 years (Fund 70)	24,235,100	4.38%	1,228,208	716,578	22,290,314	4.26%
11-12 years (Fund 60)	23,026,504	4.17%	(845,844)	705,685	23,166,663	4.43%
13-14 years (Fund 50)	23,591,676	4.27%	943,266	701,516	21,946,894	4.20%
15-16 years (Fund 40)	21,379,313	3.87%	(692,331)	637,664	21,433,980	4.10%
17-18 years (Fund 30)	18,742,609	3.39%	875,584	489,278	17,377,747	3.32%
19+ years (Fund 20)	15,182,377	2.75%	1,447,837	339,679	13,394,861	2.56%
Moderate	\$136,759,520	24.74%	\$3,140,438	\$3,760,138	\$129,858,944	24.83%
0-2 years (Fund 90)	4,790,751	0.87%	(114,574)	156,299	4,749,026	0.91%
3-5 years (Fund 80)	12,509,788	2.26%	(86,800)	403,955	12,192,633	2.33%
6-8 years (Fund 70)	20,079,337	3.63%	159,244	606,234	19,313,859	3.69%
9-10 years (Fund 60)	13,664,313	2.47%	73,161	418,475	13,172,677	2.52%
11-12 years (Fund 50)	15,223,068	2.75%	(359,840)	471,246	15,111,662	2.89%
13-14 years (Fund 40)	17,817,771	3.22%	674,811	506,254	16,636,706	3.18%
15-16 years (Fund 30)	18,344,783	3.32%	783,873	482,436	17,078,474	3.27%
17-18 years (Fund 20)	18,186,037	3.29%	734,141	408,488	17,043,408	3.26%
19+ years (Fund 10)	16,143,672	2.92%	1,276,422	306,750	14,560,500	2.78%
Conservative	\$19,492,196	3.53%	\$3,083,658	\$416,004	\$15,992,535	3.06%
0-2 years (Fund 80)	206,383	0.04%	(30,228)	6,958	229,653	0.04%
3-5 years (Fund 70)	933,365	0.17%	100,974	26,582	805,809	0.15%
6-8 years (Fund 60)	653,230	0.12%	(173,418)	19,760	806,888	0.15%
9-10 years (Fund 50)	1,873,674	0.34%	719,510	48,694	1,105,470	0.21%
11-12 years (Fund 40)	1,970,291	0.36%	(152,934)	59,210	2,064,014	0.39%
13-14 years (Fund 30)	1,423,001	0.26%	295,790	36,420	1,090,791	0.21%
15-16 years (Fund 20)	3,812,716	0.69%	864,516	87,495	2,860,705	0.55%
17-18 years (Fund 10)	4,522,043	0.82%	1,227,215	75,397	3,219,431	0.62%
19+ years (F.I.)	4,097,494	0.74%	232,233	55,487	3,809,774	0.73%
Target Portfolios	\$58,503,991	10.58%	\$1,819,006	\$1,830,639	\$54,854,346	10.49%
Target Fund 100 Portfolio	28,527,986	5.16%	(36,728)	944,028	27,620,686	5.28%
Target Fund 80 Portfolio	13,760,272	2.49%	276,607	446,072	13,037,593	2.49%
Target Fund 60 Portfolio	8,873,879	1.61%	1,193,596	265,340	7,414,943	1.42%
Target Fund 40 Portfolio	3,318,208	0.60%	(22,445)	99,547	3,241,106	0.62%
Target Fund 20 Portfolio	2,615,288	0.47%	393,335	57,001	2,164,952	0.41%
Target Fund Fixed Income Portfolio	1,408,358	0.25%	14,641	18,651	1,375,066	0.26%

Market values provided by Union Bank & Trust.

Investment Fund Balances

The table below compares the fund's investment fund balances as of June 30, 2019 with that of March 31, 2019. The change in asset distribution is broken down into the dollar change due to Net New Investment and the dollar change due to Investment Return.

Asset Distribution Across Investment Funds

Individual Funds	June 30, 2019		Net New Inv.	Inv. Return	March 31, 2019	
	Market Value	Weight			Market Value	Weight
Individual Funds	\$151,062,978	27.33%	\$2,937,747	\$4,598,415	\$143,526,816	27.44%
Money Market	\$14,363,949	2.60%	\$1,074,210	\$(4,567)	\$13,294,306	2.54%
Vanguard Prime Money Market	14,363,949	2.60%	1,074,210	(4,567)	13,294,306	2.54%
Fixed Income	\$18,205,091	3.29%	\$637,541	\$440,295	\$17,127,256	3.27%
PIMCO Short-Term	2,255,667	0.41%	21,110	9,691	2,224,867	0.43%
Vanguard Short Infl Protected	577,252	0.10%	61,922	8,529	506,801	0.10%
Vanguard Short Term Bond	1,967,440	0.36%	258,112	33,789	1,675,539	0.32%
Vanguard Infl Prot Securities	1,396,852	0.25%	83,282	36,890	1,276,680	0.24%
Fidelity Investment Grade Bond	516,955	0.09%	60,975	15,597	440,384	0.08%
Vanguard Total Bond Index	11,203,300	2.03%	146,194	327,701	10,729,406	2.05%
MainStay Total Return Bond	287,625	0.05%	5,947	8,099	273,579	0.05%
Balanced	\$5,906,711	1.07%	\$45,809	\$187,536	\$5,673,366	1.08%
T. Rowe Price Balanced	5,906,711	1.07%	45,809	187,536	5,673,366	1.08%
Domestic Equity	\$97,370,575	17.61%	\$962,178	\$3,626,123	\$92,782,274	17.74%
T. Rowe Large Cap Growth	7,607,366	1.38%	(133,056)	218,450	7,521,973	1.44%
Vanguard Growth Index	12,699,479	2.30%	102,364	567,161	12,029,954	2.30%
Vanguard Total Stock Index	16,447,811	2.98%	264,930	630,020	15,552,861	2.97%
Vanguard 500 Index	26,786,376	4.85%	651,951	1,084,187	25,050,238	4.79%
DFA US Large Cap Value	1,221,119	0.22%	35,137	34,687	1,151,296	0.22%
Vanguard Value Index	5,387,451	0.97%	(24,025)	194,120	5,217,356	1.00%
Vanguard Extended Market Index	1,963,991	0.36%	33,620	56,100	1,874,271	0.36%
Vanguard Mid Cap Index	8,630,550	1.56%	(41,557)	358,387	8,313,720	1.59%
Vanguard Explorer	1,912,079	0.35%	48,615	76,209	1,787,255	0.34%
Vanguard Small Cap Growth Index	6,614,948	1.20%	(72,596)	242,867	6,444,677	1.23%
Vanguard Small Cap Index	3,823,115	0.69%	44,395	103,394	3,675,326	0.70%
DFA US Small Cap Value	745,185	0.13%	22,781	(6,700)	729,104	0.14%
Vanguard Small Cap Value Index	3,531,105	0.64%	29,618	67,242	3,434,245	0.66%
International Equity	\$11,166,477	2.02%	\$189,773	\$283,032	\$10,693,672	2.04%
Dodge & Cox Int'l Stock	1,855,348	0.34%	39,106	49,401	1,766,840	0.34%
Vanguard Int'l Stock Index	9,311,130	1.68%	150,667	233,630	8,926,832	1.71%
Real Estate	\$4,050,174	0.73%	\$28,236	\$65,996	\$3,955,942	0.76%
Vanguard REIT Index	4,050,174	0.73%	28,236	65,996	3,955,942	0.76%
Total Direct Plan	\$552,790,442	100.0%	\$13,634,265	\$16,120,133	\$523,036,043	100.0%

Market values provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
Target Portfolios										
Target Fund 100										
Target Fund 100 Portfolio	3.42%	30	6.07%	28	11.23%	12	6.99%	14	10.66%	14
Target Fund 100 Blended Benchmark	3.46%	26	6.18%	22	11.71%	8	7.32%	10	11.10%	10
MS 529 Static Alloc 70-85	3.11%		5.26%		9.71%		5.96%		9.11%	
Aggressive Age Based 0-2 yrs (Fd 100)	3.42%	28	6.07%	30	-	-	-	-	-	-
Target Fund 100 Blended Benchmark	3.46%	25	6.18%	26	11.71%	9	7.32%	10	11.10%	9
MS 529 Age 0-4 Grp	3.15%		5.01%		9.72%		5.98%		9.14%	
Target Fund 90										
Aggressive Age Based 3-5 yrs (Fd 90)	3.37%	43	6.25%	40	-	-	-	-	-	-
Target Fund 90 Blended Benchmark	3.36%	45	6.43%	34	10.88%	9	6.98%	12	10.23%	14
MS 529 Age 5-6 Grp	3.33%		6.00%		9.28%		5.98%		8.68%	
Moderate Age Based 0-2 yrs (Fd 90)	3.37%	33	6.25%	24	-	-	-	-	-	-
Target Fund 90 Blended Benchmark	3.36%	35	6.43%	21	10.88%	23	6.98%	16	10.23%	28
MS 529 Age 0-4 Grp	3.15%		5.01%		9.72%		5.98%		9.14%	
Target Fund 80										
Target Fund 80 Portfolio	3.31%	39	6.43%	16	9.66%	51	6.26%	36	9.03%	55
Target Fund 80 Blended Benchmark	3.33%	38	6.56%	15	9.92%	42	6.45%	28	9.34%	42
MS 529 Static Alloc 70-85	3.11%		5.26%		9.71%		5.96%		9.11%	
Aggressive Age Based 6-8 yrs (Fd 80)	3.31%	33	6.43%	31	-	-	-	-	-	-
Target Fund 80 Blended Benchmark	3.33%	31	6.56%	24	9.92%	11	6.45%	15	9.34%	22
MS 529 Age 7-8 Grp	3.12%		5.58%		8.66%		5.48%		8.33%	
Moderate Age Based 3-5 yrs (Fd 80)	3.31%	53	6.43%	34	-	-	-	-	-	-
Target Fund 80 Blended Benchmark	3.33%	51	6.56%	26	9.92%	35	6.45%	33	9.34%	30
MS 529 Age 5-6 Grp	3.33%		6.00%		9.28%		5.98%		8.68%	
Conserv. Age Based 0-2 yrs (Fd 80)	3.31%	41	6.43%	20	-	-	-	-	-	-
Target Fund 80 Blended Benchmark	3.33%	40	6.56%	18	9.92%	48	6.45%	36	9.34%	49
MS 529 Age 0-4 Grp	3.15%		5.01%		9.72%		5.98%		9.14%	
Target Fund 70										
Aggressive Age Based 9-10 yrs (Fd 70)	3.10%	43	6.51%	25	-	-	-	-	-	-
Target Fund 70 Blended Benchmark	3.17%	34	6.87%	18	8.78%	15	6.04%	12	8.41%	13
MS 529 Age 9-10 Grp	3.03%		5.50%		7.69%		4.91%		7.22%	
Moderate Age Based 6-8 yrs (Fd 70)	3.10%	52	6.51%	26	-	-	-	-	-	-
Target Fund 70 Blended Benchmark	3.17%	44	6.87%	17	8.78%	48	6.04%	25	8.41%	48
MS 529 Age 7-8 Grp	3.12%		5.58%		8.66%		5.48%		8.33%	
Conserv. Age Based 3-5 yrs (Fd 70)	3.10%	76	6.51%	29	-	-	-	-	-	-
Target Fund 70 Blended Benchmark	3.17%	71	6.87%	12	8.78%	66	6.04%	45	8.41%	57
MS 529 Age 5-6 Grp	3.33%		6.00%		9.28%		5.98%		8.68%	

Performance is net of all fees, including 529 program management fees (25 bps). Performance figures provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
Target Fund 60										
Target Fund 60 Portfolio	3.16%	55	6.70%	21	7.65%	63	5.23%	52	7.21%	69
Target Fund 60 Blended Benchmark	3.18%	50	6.81%	18	8.09%	51	5.53%	44	7.57%	55
MS 529 Static Alloc 50-70	3.18%		5.67%		8.11%		5.25%		7.76%	
Aggressive Age Based 11-12 yrs (Fd 60)	3.16%	28	6.70%	24	-		-		-	
Target Fund 60 Blended Benchmark	3.18%	26	6.81%	21	8.09%	18	5.53%	16	7.57%	13
MS 529 Age 11-12 Grp	2.87%		5.76%		7.11%		4.54%		6.38%	
Moderate Age Based 9-10 yrs (Fd 60)	3.16%	34	6.70%	21	-		-		-	
Target Fund 60 Blended Benchmark	3.18%	33	6.81%	19	8.09%	34	5.53%	29	7.57%	35
MS 529 Age 9-10 Grp	3.03%		5.50%		7.69%		4.91%		7.22%	
Conserv. Age Based 6-8 yrs (Fd 60)	3.16%	44	6.70%	18	-		-		-	
Target Fund 60 Blended Benchmark	3.18%	42	6.81%	18	8.09%	67	5.53%	47	7.57%	71
MS 529 Age 7-8 Grp	3.12%		5.58%		8.66%		5.48%		8.33%	
Target Fund 50										
Aggressive Age Based 13-14 yrs (Fd 50)	3.13%	20	6.75%	20	-		-		-	
Target Fund 50 Blended Benchmark	3.14%	20	7.23%	5	7.19%	13	5.26%	10	6.89%	10
MS 529 Age 13-14 Grp	2.70%		5.41%		6.13%		3.81%		5.37%	
Moderate Age Based 11-12 yrs (Fd 50)	3.13%	32	6.75%	23	-		-		-	
Target Fund 50 Blended Benchmark	3.14%	30	7.23%	9	7.19%	46	5.26%	25	6.89%	32
MS 529 Age 11-12 Grp	2.87%		5.76%		7.11%		4.54%		6.38%	
Conserv. Age Based 9-10 yrs (Fd 50)	3.13%	40	6.75%	20	-		-		-	
Target Fund 50 Blended Benchmark	3.14%	39	7.23%	5	7.19%	66	5.26%	38	6.89%	59
MS 529 Age 9-10 Grp	3.03%		5.50%		7.69%		4.91%		7.22%	
Target Fund 40										
Target Fund 40 Portfolio	2.98%	33	6.70%	25	5.79%	59	4.42%	40	5.59%	53
Target Fund 40 Blended Benchmark	3.06%	30	7.21%	12	6.31%	40	4.79%	28	5.99%	46
MS 529 Static Alloc 30-50	2.71%		5.58%		6.11%		3.97%		5.67%	
Aggressive Age Based 15-16 yrs (Fd 40)	2.98%	22	6.70%	19	-		-		-	
Target Fund 40 Blended Benchmark	3.06%	15	7.21%	8	6.31%	13	4.79%	9	5.99%	7
MS 529 Age 15-16 Grp	2.39%		5.28%		4.67%		3.27%		3.91%	
Moderate Age Based 13-14 yrs (Fd 40)	2.98%	34	6.70%	21	-		-		-	
Target Fund 40 Blended Benchmark	3.06%	28	7.21%	5	6.31%	42	4.79%	19	5.99%	38
MS 529 Age 13-14 Grp	2.70%		5.41%		6.13%		3.81%		5.37%	
Conserv. Age Based 11-12 yrs (Fd 40)	2.98%	44	6.70%	25	-		-		-	
Target Fund 40 Blended Benchmark	3.06%	38	7.21%	9	6.31%	68	4.79%	41	5.99%	63
MS 529 Age 11-12 Grp	2.87%		5.76%		7.11%		4.54%		6.38%	
Target Fund 30										
Aggressive Age Based 17-18 yrs (Fd 30)	2.73%	22	6.51%	17	-		-		-	
Target Fund 30 Blended Benchmark	2.77%	21	6.83%	13	5.03%	13	4.03%	8	4.87%	4
MS 529 Age 17-18 Grp	2.10%		5.06%		4.03%		2.82%		3.33%	
Moderate Age Based 15-16 yrs (Fd 30)	2.73%	33	6.51%	22	-		-		-	
Target Fund 30 Blended Benchmark	2.77%	30	6.83%	16	5.03%	41	4.03%	27	4.87%	24
MS 529 Age 15-16 Grp	2.39%		5.28%		4.67%		3.27%		3.91%	
Conserv. Age Based 13-14 yrs (Fd 30)	2.73%	48	6.51%	26	-		-		-	
Target Fund 30 Blended Benchmark	2.77%	45	6.83%	18	5.03%	76	4.03%	43	4.87%	67
MS 529 Age 13-14 Grp	2.70%		5.41%		6.13%		3.81%		5.37%	

Performance is net of all fees, including 529 program management fees (25 bps). Performance figures provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
Target Fund 20										
Target Fund 20 Portfolio	2.37%	56	6.17%	42	3.69%	79	3.10%	48	3.50%	56
Target Fund 20 Blended Benchmark	2.55%	48	6.40%	39	4.22%	49	3.47%	40	3.88%	45
MS 529 Static Alloc 15-30	2.51%		5.99%		4.21%		3.08%		3.67%	
Aggressive Age Based 19+ yrs (Fd 20)	2.37%	13	6.17%	7	-		-		-	
Target Fund 20 Blended Benchmark	2.55%	9	6.40%	5	4.22%	5	3.47%	5	3.88%	5
MS 529 Age 19+ Grp	1.64%		3.99%		2.23%		1.63%		1.65%	
Moderate Age Based 17-18 yrs (Fd 20)	2.37%	33	6.17%	21	-		-		-	
Target Fund 20 Blended Benchmark	2.55%	26	6.40%	18	4.22%	37	3.47%	23	3.88%	30
MS 529 Age 17-18 Grp	2.10%		5.06%		4.03%		2.82%		3.33%	
Conserv. Age Based 15-16 yrs (Fd 20)	2.37%	51	6.17%	30	-		-		-	
Target Fund 20 Blended Benchmark	2.55%	43	6.40%	25	4.22%	61	3.47%	44	3.88%	50
MS 529 Age 15-16 Grp	2.39%		5.28%		4.67%		3.27%		3.91%	
Target Fund 10										
Moderate Age Based 19+ yrs (Fd 10)	2.00%	30	5.10%	23	-		-		-	
Target Fund 10 Blended Benchmark	2.13%	19	5.53%	12	2.90%	35	2.53%	24	2.66%	26
MS 529 Age 19+ Grp	1.64%		3.99%		2.23%		1.63%		1.65%	
Conserv. Age Based 17-18 yrs (Fd 10)	2.00%	60	5.10%	50	-		-		-	
Target Fund 10 Blended Benchmark	2.13%	46	5.53%	32	2.90%	81	2.53%	66	2.66%	68
MS 529 Age 17-18 Grp	2.10%		5.06%		4.03%		2.82%		3.33%	
Target Fund Fixed Income										
Target Fund Fixed Income Portfolio	1.36%	64	3.71%	60	1.44%	76	1.15%	67	0.77%	80
Target Fund F.I. Blended Benchmark	1.34%	66	3.77%	59	1.59%	68	1.33%	57	1.00%	74
MS 529 Static Short-Term	1.57%		4.23%		1.98%		1.46%		1.63%	
Conserv. Age Based 19+ yrs (F.I.)	1.36%	68	3.71%	58	-		-		-	
Target Fund F.I. Blended Benchmark	1.34%	69	3.77%	56	1.59%	73	1.33%	67	1.00%	75
MS 529 Age 19+ Grp	1.64%		3.99%		2.23%		1.63%		1.65%	

Performance is net of all fees, including 529 program management fees (25 bps). Performance figures provided by Union Bank & Trust.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter		Last Year		Last 3 Years		Last 5 Years		Last 7 Years	
Individual Funds Portfolios										
Money Market Funds										
Vanguard Prime Money Market (net all)*	0.57%	42	2.14%	42	1.31%	34	0.83%	30	0.60%	28
Vanguard Prime Money Market (net mgr)	0.62%	26	2.39%	22	1.55%	19	1.00%	20	0.74%	18
3-Month Treasury Bill	0.64%	23	2.31%	26	1.38%	30	0.87%	28	0.65%	24
Callan Money Market Funds	0.56%		2.08%		1.18%		0.71%		0.51%	
Fixed Income Funds										
PIMCO Short-Term (net all)	0.44%	98	1.79%	100	2.26%	24	1.67%	55	1.58%	58
PIMCO Short-Term (net mgr)	0.50%	98	2.03%	100	2.50%	9	1.90%	25	1.82%	43
3 Month T-Bills	0.61%	98	2.30%	99	1.36%	88	0.84%	96	0.62%	96
Blmbg Aggregate 1-3 Index	1.49%	42	4.28%	45	1.61%	70	1.47%	71	1.32%	72
Callan Short Term FI MFs	1.47%		4.18%		2.02%		1.71%		1.60%	
Vanguard Short Infl Protected (net all)*	1.56%	93	2.96%	91	1.34%	96	0.62%	92	-	
Vanguard Short Infl Protected (net mgr)	1.58%	92	3.16%	88	1.59%	85	0.88%	90	-	
Blmbg US TIPS 0-5 Index	1.65%	92	3.22%	87	1.64%	84	0.92%	89	0.88%	60
Callan TIPS MFs	2.66%		4.37%		2.06%		1.36%		0.96%	
Vanguard Short Term Bond (net all)*	1.78%	18	5.03%	19	1.42%	91	1.52%	74	-	
Vanguard Short Term Bond (net mgr)	1.83%	13	5.25%	15	1.67%	81	1.76%	52	1.57%	66
Blmbg Govt/Credit 1-3 Float	1.92%	10	5.34%	14	1.72%	80	1.82%	47	1.65%	61
Callan Short Inv Grade MF	1.51%		4.40%		2.07%		1.77%		1.92%	
Vanguard Infl Prot Securities (net all)	2.76%	30	4.44%	39	1.63%	84	1.44%	40	0.84%	64
Vanguard Infl Prot Securities (net mgr)	2.83%	22	4.74%	27	1.92%	64	1.69%	26	1.08%	36
Blmbg US TIPS Index	2.86%	19	4.84%	19	2.08%	47	1.76%	18	1.17%	27
Callan TIPS MFs	2.66%		4.37%		2.06%		1.36%		0.96%	
Fidelity Investment Grade Bond (net all)	3.23%	21	8.14%	25	2.83%	27	2.83%	59	-	
Fidelity Investment Grade Bond (net mgr)	3.25%	18	8.37%	12	3.12%	16	3.05%	27	2.91%	35
Blmbg Aggregate Index	3.08%	50	7.87%	39	2.31%	77	2.95%	37	2.62%	69
Callan Core Bond MFs	3.08%		7.80%		2.53%		2.91%		2.77%	
Vanguard Total Bond Index (net all)*	3.02%	62	7.65%	70	1.98%	98	2.64%	92	2.31%	93
Vanguard Total Bond Index (net mgr)	3.08%	50	7.87%	38	2.23%	81	2.90%	52	2.56%	78
Blmbg Aggregate Index	3.08%	50	7.87%	39	2.31%	77	2.95%	37	2.62%	69
Callan Core Bond MFs	3.08%		7.80%		2.53%		2.91%		2.77%	
MainStay Total Return Bond (net all)	2.90%	77	7.19%	86	2.74%	71	-		-	
MainStay Total Return Bond (net mgr)	2.97%	74	7.40%	80	2.99%	61	2.61%	89	3.00%	77
Blmbg Aggregate Index	3.08%	57	7.87%	48	2.31%	95	2.95%	65	2.62%	95
Callan Core Plus MFs	3.16%		7.85%		3.20%		3.19%		3.35%	
Balanced Funds										
T. Rowe Price Balanced (net all)	3.28%	64	6.48%	66	9.64%	31	6.20%	52	8.79%	53
T. Rowe Price Balanced (net mgr)	3.35%	64	6.66%	60	9.76%	30	6.39%	50	9.03%	50
Balanced Fund Blended Benchmark	3.79%	39	8.77%	32	9.47%	33	7.01%	30	9.21%	43
Callan Dom Balanced MFs	3.67%		7.17%		9.03%		6.39%		9.04%	
Domestic Equity Funds										
T. Rowe Large Cap Growth (net all)	2.93%	93	9.65%	68	22.75%	5	-	6	-	3
T. Rowe Large Cap Growth (net mgr)	3.00%	91	9.96%	63	23.13%	3	15.13%	6	17.99%	3
Russell 1000 Growth Index	4.64%	56	11.56%	44	18.07%	59	13.39%	40	15.76%	37
Callan Large Cap Grwth MF	4.86%		11.03%		18.85%		13.05%		15.47%	
Vanguard Growth Index (net all)	4.69%	56	10.27%	60	16.27%	80	11.71%	74	14.54%	77
Vanguard Growth Index (net mgr)	4.75%	53	10.44%	60	16.56%	74	11.98%	72	14.84%	69
U.S. Large Cap Growth Benchmark	4.76%	53	10.46%	60	16.59%	73	12.03%	72	14.91%	66
Russell 1000 Growth Index	4.64%	56	11.56%	44	18.07%	59	13.39%	40	15.76%	37
Callan Large Cap Grwth MF	4.86%		11.03%		18.85%		13.05%		15.47%	
Vanguard Total Stock Index (net all)*	3.99%	58	8.76%	48	13.76%	37	9.90%	32	13.48%	39
Vanguard Total Stock Index (net mgr)	4.09%	53	9.00%	46	14.04%	30	10.18%	29	13.78%	29
U.S. Total Market Benchmark	4.08%	54	9.00%	46	14.04%	30	10.18%	29	13.79%	29
Russell 3000 Index	4.10%	53	8.98%	46	14.02%	30	10.19%	29	13.79%	27
Callan Large Cap Core MFs	4.13%		8.54%		13.33%		9.55%		13.03%	

(net all) indicates performance is net of all fees, including 529 program management fees (25 bps).

(net all) performance figures provided by Union Bank & Trust.

(net mgr) indicates performance is net of manager fees.

* Indicates fund is held in the Age Based and Target Fund Portfolios.

Investment Fund Returns and Peer Group Rankings

The table below details the rates of return and peer group rankings for the Fund's investment funds over various time periods ended June 30, 2019. Negative returns are shown in red, positive returns in black. Returns for one year or greater are annualized.

Returns and Rankings for Periods Ended June 30, 2019

	Last Quarter	Last Year	Last 3 Years	Last 5 Years	Last 7 Years
Vanguard 500 Index (net all)	4.25%	43	10.13%	36	13.87%
Vanguard 500 Index (net mgr)	4.30%	43	10.39%	32	14.15%
S&P 500 Index	4.30%	42	10.42%	32	14.19%
Callan Large Cap Core MFs	4.13%		8.54%		13.33%
DFA US Large Cap Value (net all)	2.98%	58	2.66%	76	10.80%
DFA US Large Cap Value (net mgr)	3.09%	57	2.96%	75	11.10%
Russell 1000 Value Index	3.84%	46	8.46%	35	10.19%
Callan Lg Cap Value MF	3.67%		5.83%		11.17%
Vanguard Value Index (net all)	3.74%	47	9.66%	19	11.90%
Vanguard Value Index (net mgr)	3.77%	47	9.87%	16	12.14%
U.S. Large Cap Value Benchmark	3.79%	47	9.92%	16	12.18%
Russell 1000 Value Index	3.84%	46	8.46%	35	10.19%
Callan Lg Cap Value MF	3.67%		5.83%		11.17%
Vanguard Extended Market Index (net all)	2.95%	81	1.71%	74	12.92%
Vanguard Extended Market Index (net mgr)	3.04%	80	2.04%	74	13.16%
S&P Completion Index	3.02%	81	1.88%	74	13.05%
Callan Mid Cap MFs	5.33%		8.77%		13.11%
Vanguard Mid Cap Index (net all)	4.32%	67	7.59%	57	12.06%
Vanguard Mid Cap Index (net mgr)	4.36%	67	7.83%	55	12.32%
U.S. Mid Cap Benchmark	4.37%	67	7.85%	55	12.36%
Russell MidCap Index	4.13%	72	7.83%	55	12.16%
Callan Mid Cap MFs	5.33%		8.77%		13.11%
Vanguard Explorer (net all)	4.18%	64	6.80%	53	17.39%
Vanguard Explorer (net mgr)	4.20%	64	7.09%	52	17.72%
Russell 2500 Growth Index	4.14%	66	6.13%	58	16.14%
Callan Sm Cap Growth MF	5.26%		7.39%		18.97%
Vanguard Small Cap Growth (net all)	3.78%	68	6.58%	53	15.32%
Vanguard Small Cap Growth (net mgr)	3.83%	67	6.79%	53	15.56%
U.S. Small Cap Growth Benchmark	3.81%	68	6.78%	53	15.54%
Russell 2000 Growth Index	2.75%	81	(0.49%)	87	14.69%
Callan Sm Cap Growth MF	5.26%		7.39%		18.97%
Vanguard Small Cap Index (net all)	2.84%	56	2.12%	42	12.15%
Vanguard Small Cap Index (net mgr)	2.87%	54	2.26%	42	12.38%
U.S. Small Cap Benchmark	2.86%	54	2.29%	42	12.37%
Russell 2000 Index	2.10%	70	(3.31%)	63	12.30%
Callan Small Cap MFs	3.20%		0.83%		12.76%
DFA US Small Cap Value (net all)	(0.91%)	94	(11.17%)	95	7.29%
DFA US Small Cap Value (net mgr)	(0.79%)	93	(10.84%)	93	7.71%
Russell 2000 Value Index	1.38%	66	(6.24%)	61	9.81%
Callan Sm Cap Value MF	2.15%		(5.25%)		9.04%
Vanguard Small Cap Value Index (net all)	1.93%	58	(1.83%)	28	9.37%
Vanguard Small Cap Value Index (net mgr)	2.00%	55	(1.56%)	27	9.69%
U.S. Small Cap Value Benchmark	2.00%	55	(1.54%)	27	9.70%
Russell 2000 Value Index	1.38%	66	(6.24%)	61	9.81%
Callan Sm Cap Value MF	2.15%		(5.25%)		9.04%
International Equity					
Dodge & Cox Int'l Stock (net all)	2.75%	67	(0.59%)	57	8.95%
Dodge & Cox Int'l Stock (net mgr)	2.81%	66	(0.31%)	50	9.31%
MSCI EAFE Index	3.68%	40	1.08%	36	9.11%
MSCI ACWI ex US	2.98%	63	1.29%	35	9.39%
Callan Non US Equity MFs	3.34%		(0.22%)		8.51%
Vanguard Int'l Stock Index (net all)*	2.74%	67	0.32%	41	8.67%
Vanguard Int'l Stock Index (net mgr)	2.81%	66	0.68%	38	9.00%
Total Int'l Stock Benchmark	2.85%	66	0.50%	39	9.19%
Callan Non US Equity MFs	3.34%		(0.22%)		8.51%
Real Estate					
Vanguard REIT Index (net all)*	1.66%	73	11.92%	38	3.80%
Vanguard REIT Index (net mgr)	1.76%	69	12.26%	28	4.05%
MSCI US IMI Real Estate 25/50	1.76%	69	12.22%	29	3.85%
NAREIT All Equity Index	1.79%	68	13.01%	26	5.92%
Callan Real Estate MFs	2.24%		11.17%		4.41%

(net all) indicates performance is net of all fees, including 529 program management fees (25 bps).

(net mgr) performance figures provided by Union Bank & Trust.

(net mgr) indicates performance is net of manager fees.

* Indicates fund is held in the Age Based and Target Fund Portfolios.

Alabama CollegeCounts Direct Plan, Executive Summary
Investment Manager Performance Monitoring Summary Report
June 30, 2019

Investment Manager	Last Quarter Return	Last Year Return	3 Year Return	5 Year Return	7 Year Return	7 Year Risk Quadrant	7 Year Return Consistency	7 Year Excess Rtn Ratio	7 Year Sharpe Ratio
Money Market Funds									
Vanguard Prime Money Market Callan Money Market Funds	0.6 26	2.4 22	1.6 19	1.0 20	0.7 18			1.5 7	0.2 18
3-Month Treasury Bill	0.6 23	2.3 26	1.4 30	0.9 28	0.6 24				0.0 24
Fixed Income Funds									
PIMCO Short-Term Callan Defensive FI MFs	0.5 98	2.0 100	2.5 9	1.9 25	1.8 43			1.2 34	1.2 20
3 Month T-Bills	0.6 98	2.3 99	1.4 88	0.8 96	0.6 96				-0.1 96
Vanguard Short Infl-Protected (i) Callan TIPS MFs	1.6 92	3.2 88	1.6 85	0.9 90					
Blmbg US TIPS 0-5 Idx	1.6 92	3.2 87	1.6 84	0.9 89	0.9 60				0.1 23
Vanguard Short Term Bond (i) Callan Short Inv Grade MF	1.8 13	5.2 15	1.7 81	1.8 52	1.6 66			-1.0 94	0.6 71
Blmbg Govt/Cred 1-5 Float Adj	1.9 10	5.3 14	1.7 80	1.8 47	1.6 61				0.7 67
Vanguard Infl Prot Securities Callan TIPS MFs	2.8 22	4.7 27	1.9 64	1.7 26	1.1 36			-0.3 63	0.1 39
Blmbg US TIPS Index	2.9 19	4.8 19	2.1 47	1.8 18	1.2 27				0.1 25
Fidelity Investment Grade Bond Callan Core Bond MFs	3.2 18	8.4 12	3.1 16	3.1 27	2.9 35			0.3 43	0.7 53
Blmbg Aggregate Index	3.1 50	7.9 39	2.3 77	2.9 37	2.6 69				0.6 60
Vanguard Total Bond Market Index (i) Callan Core Bond MFs	3.1 50	7.9 38	2.2 81	2.9 52	2.6 78			-0.5 94	0.6 84
Blmbg Aggregate Index	3.1 50	7.9 39	2.3 77	2.9 37	2.6 69				0.6 60
MainStay Total Return Bond Callan Core Plus MFs	3.0 74	7.4 80	3.0 61	2.6 89	3.0 77			0.3 80	0.7 79
Blmbg Aggregate Index	3.1 57	7.9 48	2.3 95	2.9 65	2.6 95				0.6 90
Balanced Funds									

Returns:
■ above median
■ third quartile
■ fourth quartile



Return Consistency:
■ above median
■ third quartile
■ fourth quartile

Excess Return Ratio:
■ above median
■ third quartile
■ fourth quartile

Sharpe Ratio:
■ above median
■ third quartile
■ fourth quartile

(i) - Indexed scoring method used. Green: manager & index ranking differ by <= +/- 10%tile. Yellow: manager & index ranking differ by <= +/- 20%tile. Red: manager & index ranking differ by > +/- 20%tile.

Alabama CollegeCounts Direct Plan, Executive Summary
Investment Manager Performance Monitoring Summary Report
June 30, 2019

Investment Manager	Last Quarter Return	Last Year Return	3 Year Return	5 Year Return	7 Year Return	7 Year Risk Quadrant	7 Year Return Consistency	7 Year Excess Rtn Ratio	7 Year Sharpe Ratio
T. Rowe Price Balanced Callan Dom Balanced MFs Balanced Fund Blended Benchmark	3.4 64	6.7 60	9.8 30	6.4 50	9.0 50			-0.1 74	1.2 61
Domestic Equity									
T. Rowe Large Cap Growth Callan Large Cap Grwth MF Russell 1000 Growth Index	3.0 91	10.0 63	23.1 3	15.1 6	18.0 3			0.5 7	1.4 7
Vanguard Growth Index (i) Callan Large Cap Grwth MF U.S. Large Cap Growth Benchmark	4.7 53	10.4 60	16.6 74	12.0 72	14.8 69			-1.9 100	1.2 68
Vanguard Total Stock Index (i) Callan Large Cap Core MFs U.S. Total Market Benchmark	4.1 53	9.0 46	14.0 30	10.2 29	13.8 29			-0.2 64	1.2 49
Vanguard 500 Index (i) Callan Large Cap Core MFs S&P 500 Index	4.3 43	10.4 32	14.2 27	10.7 20	14.0 21			-3.2 100	1.3 12
DFA US Large Cap Value Callan Lg Cap Value MF Russell 1000 Value Index	3.1 57	3.0 75	11.1 53	7.2 50	13.3 15			0.4 12	1.1 35
Vanguard Value Index (i) Callan Lg Cap Value MF U.S. Large Cap Value Benchmark	3.8 47	9.9 16	12.1 21	9.3 10	13.1 17			-1.6 100	1.3 14
Vanguard Extended Market Index (i) Callan Mid Cap MFs S&P Completion Index	3.0 80	2.0 74	13.2 50	7.8 53	12.8 43			1.6 1	0.9 46
Vanguard Mid Cap Index (i) Callan Mid Cap MFs U.S. Mid Cap Benchmark	4.4 67	7.8 55	12.3 55	8.8 47	13.4 32			-2.2 100	1.1 24

Returns:
■ above median
■ third quartile
■ fourth quartile



Return Consistency:
■ above median
■ third quartile
■ fourth quartile

Excess Return Ratio:
■ above median
■ third quartile
■ fourth quartile

Sharpe Ratio:
■ above median
■ third quartile
■ fourth quartile

(i) - Indexed scoring method used. Green: manager & index ranking differ by <= +/- 10%tile. Yellow: manager & index ranking differ by <= +/- 20%tile. Red: manager & index ranking differ by > +/- 20%tile.

Alabama CollegeCounts Direct Plan, Executive Summary
Investment Manager Performance Monitoring Summary Report
June 30, 2019

Investment Manager	Last Quarter Return	Last Year Return	3 Year Return	5 Year Return	7 Year Return	7 Year Risk Quadrant	7 Year Return Consistency	7 Year Excess Rtn Ratio	7 Year Sharpe Ratio
Vanguard Explorer Callan Sm Cap Growth MF Russell 2500 Growth Index	4.2 64	7.1 52	17.7 62	10.0 64	14.4 48			0.1 40	1.0 14
Vanguard Small Cap Growth Index (i) Callan Sm Cap Growth MF U.S. Small Cap Growth Benchmark	3.8 67	6.8 53	15.6 80	9.0 76	13.2 74			0.1 80	0.9 62
Vanguard Small Cap Index (i) Callan Small Cap MFs U.S. Small Cap Benchmark	2.9 54	2.3 42	12.4 53	7.7 49	12.7 46			0.2 43	0.9 35
DFA US Small Cap Value Callan Sm Cap Value MF Russell 2000 Value Index	-0.8 93	-10.8 93	7.7 76	3.3 82	10.2 68			-0.0 68	0.6 70
Vanguard Small Cap Value Index (i) Callan Sm Cap Value MF U.S. Small Cap Value Benchmark	2.0 55	-1.6 27	9.7 45	6.6 31	12.1 15			-0.9 92	0.9 21
International Equity									
Dodge & Cox Int'l Stock Callan Non US Equity MFs MSCI EAFE Index	2.8 66	-0.3 50	9.3 34	0.4 87	7.2 45			-0.0 45	0.5 63
Vanguard Int'l Stock Index (i) Callan Non US Equity MFs Total Int'l Stock Benchmark	2.8 66	0.7 38	9.0 41	2.4 50	6.6 62			-0.1 91	0.5 85
Real Estate Funds									
Vanguard REIT Index (i) Callan Real Estate MFs MSCI US IMI Real Estate 25/50	1.8 69	12.3 28	4.1 58	7.7 47	8.7 36			0.2 72	0.6 92

Returns:
■ above median
■ third quartile
■ fourth quartile

Risk Quadrant:


Return Consistency:
■ above median
■ third quartile
■ fourth quartile

Excess Return Ratio:
■ above median
■ third quartile
■ fourth quartile

Sharpe Ratio:
■ above median
■ third quartile
■ fourth quartile

(i) - Indexed scoring method used. Green: manager & index ranking differ by <= +/- 10%tile. Yellow: manager & index ranking differ by <= +/- 20%tile. Red: manager & index ranking differ by > +/- 20%tile.

Morningstar Ratings and Rankings

Plan 2 - Direct - Fund Name	Morningstar Category	Ticker	Morningstar Rating	Market Value*
DFA U.S. Large Cap Value	Large Value	DFLVX	4	\$97,727,830
DFA U.S. Small Cap Value	Small Value	DFSVX	3	\$742,749
Dodge & Cox International Stock	Foreign Blend	DODFX	4	\$1,855,840
Fidelity Advisor Investment Grade Bond	Intermediate-Term Bond	FGBPX	4	\$3,164,104
Mainstay Total Return Bond	Intermediate-Term Bond	MTMIX	3	\$100,125,246
PIMCO Short-Term	Ultrashort Bond	PTSHX	5	\$151,317,495
T. Rowe Price Balanced	Moderate Allocation	RPBAX	4	\$56,596,415
T. Rowe Price Large-Cap Growth	Large Growth	TRLGX	5	\$105,156,388
Vanguard 500 Index	Large Blend	VINIX	5	\$26,773,338
Vanguard Explorer	Small Growth	VEXRX	4	\$1,916,662
Vanguard Extended Market Index	Mid-Cap Blend	VEXAX	4	\$1,963,947
Vanguard Growth Index	Large Growth	VIGAX	4	\$12,700,773
Vanguard Inflation-Protected Securities	Inflation-Protected Bond	VAIPX	4	\$1,396,820
Vanguard Mid-Cap Index	Mid-Cap Blend	VIMAX	5	\$8,633,611
Vanguard Prime Money Market	Taxable Money Market	VMRXX	N/A	\$25,390,893
Vanguard Real Estate Index (REIT Index)	Real Estate	VGSNX	4	\$21,735,406
Vanguard Short Term Bond	Short-Term Bond	VBITX	3	\$46,170,114
Vanguard Short-Term Infl-Protected	Inflation-Protected Bond	VTSPX	2	\$25,055,641
Vanguard Small-Cap Growth Index	Small Growth	VSGAX	3	\$6,615,117
Vanguard Small-Cap Index	Small Blend	VSMAX	5	\$3,823,001
Vanguard Small-Cap Value Index	Small Value	VSIAX	5	\$3,531,125
Vanguard Total Bond Market Index	Intermediate-Term Bond	VBPIX	3	\$106,713,371
Vanguard Total International Stock Index	Foreign Large Blend	VTSNX	3	\$81,461,391
Vanguard Total Stock Market Index	Large Blend	VITSX	4	\$152,666,283
Vanguard Value Index	Large Value	VVIAX	4	\$5,386,473

*Asset totals include age based, target portfolio assets, advisor and direct plans where applicable.

Summary of Fund Performance Status

Plan 2 - Direct - Fund Name	Prior Quarter Status	Current Quarter Status	Market Value*
DFA U.S. Large Cap Value	Positive	Positive	\$97,727,830
DFA U.S. Small Cap Value	Watch	Watch	\$742,749
Dodge & Cox International Stock	Watch	Watch	\$1,855,840
Fidelity Advisor Investment Grade Bond	Positive	Positive	\$3,164,104
Mainstay Total Return Bond	Positive	Positive	\$100,125,246
PIMCO Short-Term	Positive	Positive	\$151,317,495
T. Rowe Price Balanced	Positive	Positive	\$56,596,415
T. Rowe Price Large-Cap Growth	Positive	Positive	\$105,156,388
Vanguard 500 Index	Positive	Positive	\$26,773,338
Vanguard Explorer	Positive	Positive	\$1,916,662
Vanguard Extended Market Index	Positive	Positive	\$1,963,947
Vanguard Growth Index	Positive	Positive	\$12,700,773
Vanguard Inflation-Protected Securities	Positive	Positive	\$1,396,820
Vanguard Mid-Cap Index	Positive	Positive	\$8,633,611
Vanguard Prime Money Market	Positive	Positive	\$25,390,893
Vanguard Real Estate Index(REIT Index)	Positive	Positive	\$21,735,406
Vanguard Short Term Bond	Positive	Positive	\$46,170,114
Vanguard Short-Term Infl-Protected	Positive	Positive	\$25,055,641
Vanguard Small-Cap Growth Index	Positive	Positive	\$6,615,117
Vanguard Small-Cap Index	Positive	Positive	\$3,823,001
Vanguard Small-Cap Value Index	Positive	Positive	\$3,531,125
Vanguard Total Bond Market Index	Positive	Positive	\$106,713,371
Vanguard Total International Stock Index	Positive	Positive	\$81,461,391
Vanguard Total Stock Market Index	Positive	Positive	\$152,666,283
Vanguard Value Index	Positive	Positive	\$5,386,473

*Asset totals include age based, target portfolio assets, advisor and direct plans where applicable.

- Funds identified as “Currently on Watch” are those whose Watch status has been approved by the CollegeCounts Board.
- Watch list status based on Watch List guidelines defined in the Investment Policy Statement.

Manager/Product Updates

Manager/Product Updates

American Century Investments-Advisor Plan

During the second quarter, American Century released the following update:

“American Century Investments® recently announced a leadership change within its Disciplined Equity group. Peruvemba Satish, Ph.D., CFA, senior vice president, senior portfolio manager, and head of Global Analytics, was appointed as chief investment officer, Disciplined Equity, effective May 24, 2019. Satish assumes this responsibility from Vinod Chandrashekar, Ph.D., senior vice president, senior portfolio manager and chief investment officer, Disciplined Equity, who is leaving the firm to pursue other opportunities.

Satish takes over the 15-member Disciplined Equity team of portfolio managers, quantitative analysts, data scientists and investment technologists who manage \$13.3 billion in assets. The investment professionals on this team average 17 years in the industry and 8 years at American Century. Satish brings proven leadership and more than 23 years of experience in the areas of quantitative analytics, product engineering, portfolio management, risk management, liquidity risk and capital markets to his new role. This includes building and leading quantitative research teams and managing traditional and alternative investment strategies in all asset classes.

Satish joined American Century in 2014 to develop the Global Analytics team, which provides quantitative support to our investment teams in the areas of global macro research, alpha research and product engineering. He was promoted to portfolio manager in 2017, adding co-portfolio manager of the Multi-Asset Real Return strategy to his responsibilities. More recently, he was instrumental in developing our intelligent beta ETFs. Satish retains his current responsibilities as head of Global Analytics and a co-portfolio manager on the Multi-Asset Real Return strategy and three ETFs, in addition to his new responsibilities. Satish earned a Ph.D. in finance from the University of Texas at Austin, a master's degree in economics from the State University of New York, and bachelor's and master's degrees in mechanical engineering and economics from Birla Institute of Technology & Science in Pilani, India. He is a CFA charterholder and member of the CFA Institute.

Satish's extensive background as a leader of quantitative teams and the success he has demonstrated since joining American Century give us great confidence that Satish will add value in his new role as CIO of Disciplined Equity.

Vinod, who joined the Disciplined Equity group in 2013 as director of Quantitative Research and assumed the CIO role in 2017, will relinquish his CIO responsibilities May 24. He remains with the firm until mid-August and will continue as co-portfolio manager on the Non-U.S. Disciplined Large Cap Core and Non-U.S. Disciplined Large Cap Value strategies until his departure or a replacement is named. We thank Vinod for his service and contributions to our firm and clients and wish him well in the future.”

Watch List

Watch List

The following Fund is recommended to be added to the Watch List:

None at this time.

The following Fund is recommended to be removed from the Watch List:

None at this time.

The following Funds are recommended to remain on the Watch List:

The BlackRock Inflation-protected Bond Fund (Advisor Plan)

Availability:	This fund is an individual option.
Issue:	During the second quarter, the fund posted a return of 2.54% vs. the 2.86% return of the benchmark. Longer term performance lags the benchmark and median peer over the 3 and 5-year periods.
Analysis:	N/A
Recommendation:	Watch list
Date on Watch:	August 2015
Plan Assets:	\$2,151,746

DFA U.S. Small Cap Value (Direct Plan)

Availability:	This fund is an individual option.
Issue:	DFA U.S. Small Cap Value was added to the Watch List due to performance issues.
Analysis:	Over the trailing three-year period the fund ranks in the 76 th percentile of peers and underperformed the Russell 2000 Value index by 2.1%. The one year period lags the Russell 2000 Value index by 4.6%. The fund posted a second quarter return of -0.79% trailing the benchmark return of 1.38%
Recommendation:	Watch list
Date on Watch:	December 2018
Plan Assets:	\$742,749

Dodge & Cox International Stock Fund (Direct Plan)

Availability:	This fund is an individual option.
Issue:	The Dodge & Cox International Stock Fund was added to the Watch List due to performance issues.
Analysis:	Over the trailing three-year period the fund ranks in the 34 th percentile of peers and lagged the MSCI EAFE index by 0.20%. The one year period lags the MSCI EAFE index by 1.39% and ranks in the 50 th percentile of peers. This quarter the fund posted a return of 2.81% trailing the 3.68% return of the benchmark.

Recommendation: Watch list
Date on Watch: August 2018
Plan Assets: \$1,855,840

Touchstone High Yield Fund (Advisor Plan)

Availability: This fund is offered as an individual option and an underlying fund.
Issue: Underperformance
Analysis: The Fund lagged the benchmark by 0.88% for the last 3 years and ranks in the 61st percentile among peers. This quarter, the Fund outperformed the High Yield II Index by 0.26% and ranked in the 31st percentile of Callan High Yield Mutual Fund peer group.
Recommendation: Watch list
Date on Watch: August 10, 2016
Plan Assets: \$44,597,913

American Century Equity Growth Fund (Advisor Plan)

Availability: This fund is offered as an individual option
Issue: Underperformance
Analysis: The Fund lags the S&P 500 Index by 1.96% for the last 5 years and by 0.46% for the last 3 years. The Fund ranks in the 38th percentile among peers for the three-year time-period. The Fund underperformed the S&P 500 for the one year period and ranks in the 58th percentile of peers. This quarter the Fund underperformed the S&P 500 Index by 0.69% and ranked in the 71st percentile of its peer group. The longer-term underperformance is driven by the significant underperformance in 2015 and first half of 2016.
Recommendation: Watch list
Date on Watch: August 10, 2016
Plan Assets: \$6,664,294

William Blair Small Cap Value (Advisor Plan)

Availability: This fund is offered as an individual option
Original Issue: Underperformance
Analysis: During the second quarter the Fund had a return of 2.85% which outperformed the benchmark by 1.47% and ranked in the 36th percentile of Callan's Small Cap Value Mutual Fund peer group. For the three year period, the Fund lags the benchmark by 2.07% and ranks in the 75th percentile of peers. The 5-year return trails the benchmark by 0.25% and ranks in the 51st percentile of peers.
Recommendation: Watch list
Date on Watch: May 16, 2018
Plan Assets: \$10,974,039

Watch List Criteria

Watch List Criteria

Performance Objectives

The Board shall evaluate investment performance on a quarterly basis relative to an assigned benchmark and peer group. Each individual fund portfolio will have an assigned benchmark and peer group and the multi-fund portfolios will have a blended benchmark.

Passive Options:

The objective of an index fund is to match the performance of its benchmark with minimal tracking error. As a result, the evaluation of index funds will focus on their ability to match the return of the benchmark on a gross-of-fee basis and to do so with minimal tracking error.

Active Options:

The objective of an actively managed fund is to outperform its benchmark over longer periods on a net-of-fee basis. Longer periods will be defined as 3 to 5 years or a full market cycle for measuring purposes. The specific objectives are as follows:

- Outperform its benchmark and rank in the top half of its peer group over the trailing 3 to 5 years or a full market cycle.
- Demonstrate percentile risk-adjusted performance above the 75th percentile as measured against its peer group over the trailing 3 to 5 years or a full market cycle.

Multi-Fund Options:

Since it is not feasible to replace the entire suit of multi-fund offerings, performance evaluation will focus on the underlying funds that are causing the under- or outperformance of the overall portfolio.

Watch List Standards

A number of factors may contribute to a portfolio's over- or under-performance at any given time, including market dynamics, investment skill, chance or a combination thereof. Because a portfolio's performance might be attributable to factors that do not reflect deficiencies in skills, strategy or investment philosophy/process, it may be unwise to recommend termination solely because a portfolio performs below expectations for a certain period of time. A "Watch List" will be utilized to identify those portfolios whose performance or other factors are cause for further assessment, possible termination, or other action by the Board.

A portfolio may be placed on Watch and an appropriate review and analysis of the investment manager may be conducted, when one or more of the following events occur:

- The portfolio fails to meet the performance objectives outlined in this Statement;
- There is a change in the investment manager's organization, investment philosophy and/or personnel;
- There is a significant change in the investment manager's assets under management in the product or firm-wide;
- There is an indication that the investment manager is deviating from his/her stated style and/or strategy;

- There is a significant increase in the portfolio's fees or expenses;
- There are legal, SEC and/or other regulatory agency proceedings affecting the manager; and/or
- Any issue or event deemed relevant by the Board.

The Board may decide to take no action or it may vote to place the individual fund portfolio on Watch. In making this decision, the Board may use quantitative or qualitative information or a combination of both. Once on Watch, the individual fund portfolio will be monitored closely. Specifically, the Program Manager will provide a quarterly report explaining causes of underperformance or improvement. Additionally, the Investment Consultant will monitor the individual fund portfolio carefully and provide additional reports as necessary. This increased level of monitoring continues quarter-by-quarter until the Board releases the individual fund portfolio from Watch or takes other corrective actions.