



## **CONNECTICUT HIGHER EDUCATION TRUST (CHET) ADVISORY COMMITTEE MEETING**

Friday, December 10, 2021  
9:30 A.M. – 11:00 A.M.  
Zoom Video-Conference Meeting / Public Webinar

<https://us06web.zoom.us/j/88657674022?pwd=NDIzL3NRRmwwOHRlbE91SGpseUdrZz0>  
Passcode: CHET2021

### **AGENDA**

- 1) Call to Order: State Treasurer Shawn T. Wooden
- 2) Welcome Remarks
- 3) Approval of the Minutes of the Meeting of Monday, December 7, 2020
- 4) Presentation by the Office of the Treasurer regarding 2021 CHET Direct and Advisor Plans
- 5) Presentation by Fidelity Investments regarding the CHET Direct & Advisor Plans
  - CHET Direct and Advisor Program Update
  - Investment Performance Review
- 6) Presentation by AKF Consulting regarding the 529 Market Landscape
- 7) Other Business
- 8) Adjournment

## Connecticut Higher Education Trust (“CHET”) Advisory Committee Annual Meeting

Monday, December 7, 2020, 11:00 A.M. – 12:30 P.M.

Zoom Meeting / Public Webinar

<https://portal.ct.gov/OTT/Financial-Education/CHET/CHET-Advisory-Committee>

### MINUTES

#### **Members Present**

Shawn T. Wooden, State Treasurer and Trustee of CHET  
Timothy D. Larson, Executive Director, Office of Higher Education  
Holly Williams, Fiscal and Program Policy Section Director, Office of Policy and Management  
State Representative Holly Cheeseman, Ranking Member, Finance, Revenue and Bonding Committee, on behalf of State Representative Christopher Davis  
State Representative Kathleen M. McCarty, Ranking Member, Education Committee  
State Senator Douglas McCrory, Senate Co-Chair, Education Committee  
Steven McDowell Jr., Associate Vice President for Financial Aid Services and Title IX Services, Connecticut State Community College  
Julie Savino, Executive Director, University Financial Assistance, Sacred Heart University  
Kerry Kelly, Interim CFO, Connecticut State Community College  
Patrick Torre, Vice President of Finance, University of New Haven  
Steven McDowell Jr., Associate Vice President for Financial Aid Services and Title IX Services, Connecticut

#### **Members Absent**

Emily Bjornberg, Senior Consultant, Academic Affairs Division, Office of Policy and Management  
State Representative Jason Rojas, Ranking Member, Finance, Revenue and Bonding Committee  
State Representative Bobby Sanchez, House Co-Chair, Education Committee  
State Senator Eric C. Berthel, Ranking Member, Education Committee  
State Senator John Fonfara, Senate Co-Chair, Finance, Revenue and Bonding Committee  
State Senator Kevin D. Witkos, Ranking Member, Finance, Revenue and Bonding Committee

#### **Others Present**

Laurie Martin, Chief Investment Officer, Office of the Treasurer, Treasurer's Designee  
Raynald Leveque, Deputy Chief Investment Officer, Office of the Treasurer, Treasurer's Designee  
Peter Gajowiak, Senior Investment Officer, Office of the Treasurer  
Jennifer Putetti, Legal Advisor, Office of the Treasurer  
Melissa Ridolfi, Vice President, Retirement & College Savings, Fidelity Investments  
Ron Hazel, Senior Director, Retirement & College Savings – Advisor Plan, Fidelity Investments  
Justin Rozzero, Director, Retirement & College Savings – Direct Plan, Fidelity Investments  
Sharon Rogers, Director, Segment Marketing – Direct Plan, Fidelity Investments  
Andrew O'Connell, Vice President, Marketing – Advisor Plan, Fidelity Investments  
Pamela Everhart, Head of Regional Public Affairs, Fidelity Investments  
Eric Kaplan, Head of Target Date and 529 Products, Fidelity Investments  
Heather Zakian, Institutional Portfolio Management, Fidelity Investments  
Dan Terio, Vice President, Asset Allocation Investment Product, Fidelity Investments  
Jessica Bialas, Director, 529 Investment Product, Fidelity Investments

## **Call to Order**

Treasurer Shawn T. Wooden called the meeting to order at 11:07 a.m. He greeted the members virtually and thanked them for attending this rescheduled meeting due to postponed related to the COVID-19 pandemic. Treasurer Wooden then welcomed the newest members to the CHET Advisory Committee meeting and delivered welcoming remarks that highlighted the activity of the office in 2020, growth in the program, the Request for Proposal search for the CHET program.

He then turned the meeting over to Chief Investment Officer Laurie Martin and Deputy Chief Investment Officer Raynald Leveque to chair the remainder of the meeting.

## **Adoption of Minutes**

Treasurer Wooden made a request to entertain a motion to approve the minutes from the prior meeting on April 12, 2019. A motion was made by Patrick Torre to approve the minutes, seconded by Julie Savino. The minutes were approved with one minor correction by majority vote.

## **Overview of CHET Program**

Laurie Martin gave a brief overview of the CHET program in 2020, discussed the increased oversight during the COVID-19 pandemic and RFP process. Raynald Leveque discussed the third quarter 2020 program statistics for the CHET Direct and Advisor plans, the selection of Fidelity Investments and key attributes and capabilities that Fidelity brings to continue to grow the CHET program going forward.

## **Presentation by Fidelity Investments**

Melissa Ridolfi discussed why Fidelity Investments offers CHET a superior college savings experience for participants.

Justin Rozzero and Ron Hazel discussed the CHET Direct and Advisor experience.

Sharon Rogers and Andy O'Connell discussed Fidelity's marketing efforts for both CHET Direct and Advisor plans, discussing the comprehensive multi-channel plans for paid advertising, earned and owned channels.

Pamela Everhart discussed the future Financial Literacy efforts for the CHET program, extending the commitment for financial education in underserved communities.

Heather Zakian and Eric Kaplan discussed the CHET product choices, glidepath construction, investment process and philosophy. Holly Cheeseman inquired about partnering with local pediatricians, PTAs and PTOs with regards to CHET and outreach by elected officials. Sharon Rogers responded by detailing an example of 529 marketing in Massachusetts on a newborn channel in hospitals and maternity wards and partnership with local health care providers. Raynald Leveque discussed the benefits of CHET Baby Scholars for Connecticut participants. Holly Cheeseman shared positive sentiments about the CHET Baby Scholars program and Financial Literacy.

Kathleen McCarthy inquired about the cybersecurity protocols in place with Fidelity Investments. Melissa McCarthy responded that cybersecurity at Fidelity is a business strategy and not a single initiative,

discussed the various tactics that ensures client account safety and information is protected. Raynald Leveque will distribute the Fidelity's Cybersecurity Program to the committee members.

**Next Meeting Date**

Laurie Martin announced plans to schedule a meeting in June 2021 following the transition of the CHET Direct and Advisor Plans.

**Adjournment**

Kathleen McCarthy thanked the Office of the Treasurer CHET team for the advisory materials in advance. Raynald Leveque called for a motion to adjourn, which was seconded. The meeting adjourned at 12 PM.

DRAFT

# Connecticut State Treasurer Shawn T. Wooden



**CHET Advisory Committee Meeting  
December 10, 2021**

## Conversion

- Converted from TIAA-CREF (Direct) & Hartford Funds (Advisor) to Fidelity
- Over 90% of assets converted by Q3-2021
- Regular meetings with Fidelity, OTT & CHET consultants

## Benefits

- Fidelity brings strong advantages to CHET to improve investment outcomes
- Multiple choices from low-cost index to active options
- Progressive glidepath construction

## Enhancements

- Working with Fidelity to enhance the platform for ease of use
- Brought in program consultant, AKF, as a strong partner to the Office of the Treasurer
- Build on existing CHET programs

## CHET program highlights since conversion to Fidelity Investments

**\$4.2B**

Direct Plan  
Program Assets

**\$882M**

Advisor Plan  
Program Assets



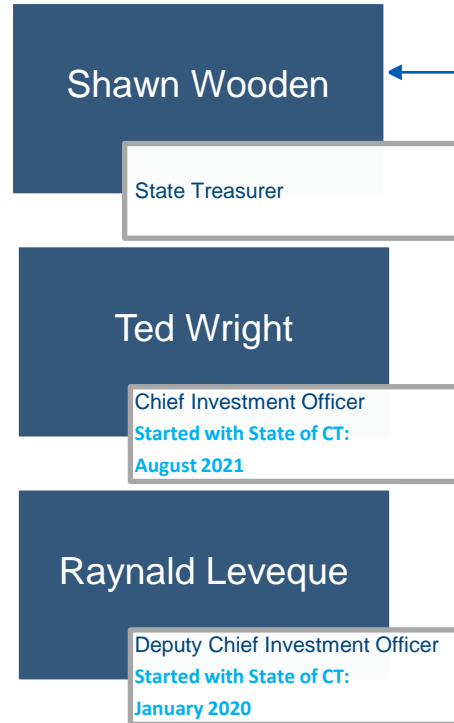
- In 2021, CHET 529 direct and advisor plans received a bronze medal rating from Morningstar
- Fidelity is working on several enhancements
  - Asset allocation changes
  - Adding a Stable Value offering for CHET Direct
  - Payroll Direct Deposit for State Employees
  - Lowering fees



- Post conversion, the future for CHET will get stronger with Fidelity Investments as our long-term program partner, driving stronger investment outcomes for education expenses
- The Office of the Treasurer continues to support programs that make CHET unique among 529 state plans, ranging from Baby Scholars to the Dream BIG! Scholarship program
- Our new partner to CHET will enhance our efforts to optimize the Fidelity platform for participants and enable our office to continue to expand the opportunity of college savings to all Connecticut families

- CHET Organization Chart
- Investment Consultant – Aon Investments
- Program Consultant – AKF Consulting

## CHET Investment Team – State of Connecticut



Elected as State Treasurer – November 2018

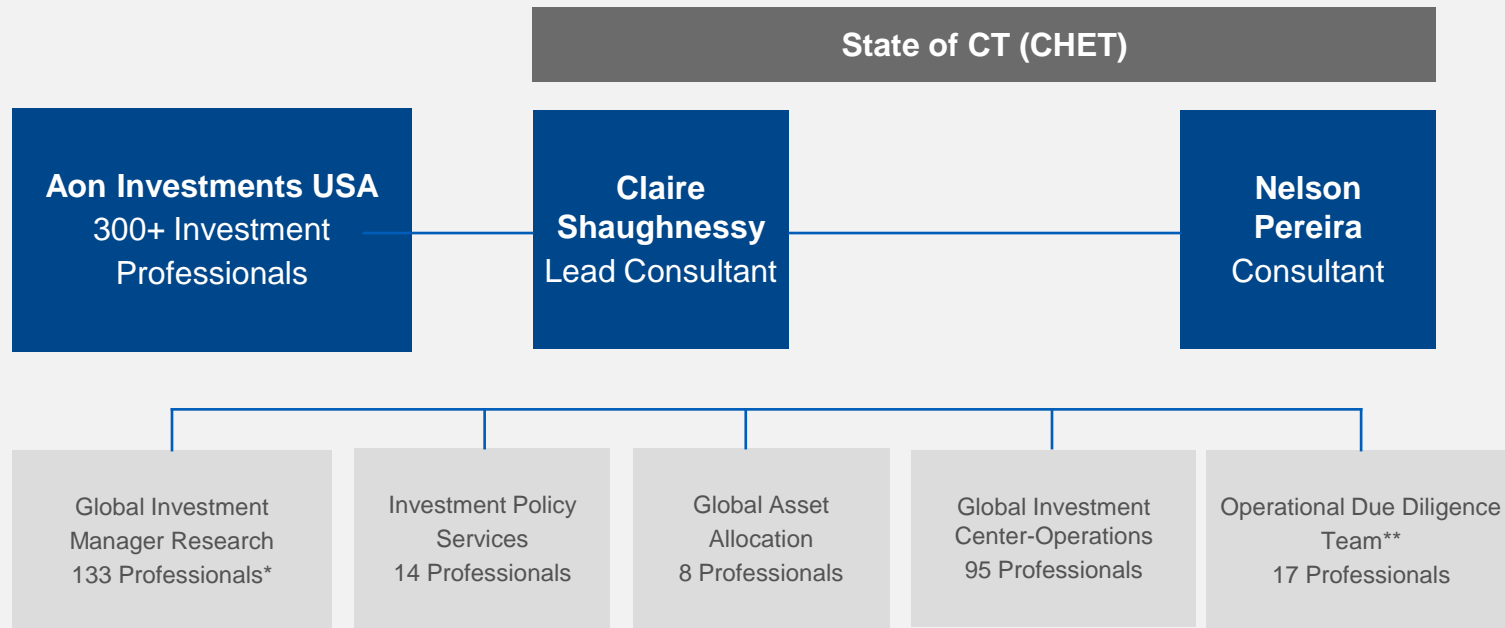
**Primary areas of focus:**

- Principal fiduciary for the Connecticut Higher Education Trust
- Chair of CHET Advisory Committee

### CHET Investment Team

Lyn Farris, Principal Investment Officer – Global Fixed Income  
Paul Osinloye, Principal Investment Officer – Global Equities  
Michael Terry, Principal Investment Officer – Short Term Investment Funds  
Peter Gajowiak, Principal Investment Officer – Performance, Reporting and Analysis  
Raymond Tuohey, Program Support

## CHET Investment Consultant – Aon Investments USA Inc.



\*Total combined research staff as of 03/31/2021 includes 57 GIC Manager Research Staff, 76 Townsend colleagues from advisory, portfolio management and strategy teams. Offshore, Innovation, and support staff represent additional colleagues. Some team members have cross-team responsibilities or reporting lines outside the manager research function, includes Aon Investments and its global Aon affiliates.

\*\*Operational due diligence is conducted by Aon's fully independent Operational Risk Solutions and Analytics (ORSA) group. ORSA is an independent entity from Aon Investments USA Inc. Investment advice is provided by Aon Investments USA Inc. ORSA total combined staff as of 12/31/2021 (includes 11 onshore ODD and 6 India ODD team members).

## CHET Program Consultant – AKF Consulting Group

### State of CT (CHET)

<b>AKF Consulting Group</b> 11 Professionals*	<b>Managing Directors</b> Andrea Feirstein (Lead Consultant) Diana Cantor (Governance)**	<b>Senior Consultants</b> Mark Chapleau (Legal)** Juliana Crist (Program)** Martin Feinstein (Analytics)** Sean McInerney (Systems)**	<b>Overall Engagement</b> Soohyang Lee (Vice President) Kiran Siddique (Associate)
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Governance and  
Fiduciary Matters\*\*

Marketing and  
Communications\*\*

Legal, Regulatory and  
Disclosure\*

New Initiatives Launch  
and Oversight

Project Plan  
Management

Systems and  
Operations\*\*

Analytics, Metrics and  
Projections\*\*

Compliance Matters\*\*

\*Includes Professionals dedicated solely to State-run Retirement and Compliance

\*\*Non-Municipal Advisor or Non-Municipal Advisory Services

# CHET: Advisory Committee Program Review

As of September 30, 2021



For State Sponsor Use Only

## 529 Industry Update

### Advisor Market

	Assets (\$M)	% Growth (Q2 2021 to Q3 2021)	Market Share	2021 M* Rating
1. Virginia	\$88,251	-1.6%	51.0%	Bronze
2. Maine	\$11,091	-2.0%	6.4%	Negative
3. New York	\$7,877	-1.4%	4.6%	Neutral
4. Illinois	\$7,124	-1.8%	4.1%	Neutral
5. Ohio	\$6,629	-2.5%	3.8%	Bronze
<b>21. Connecticut</b>	<b>\$882</b>	<b>-1.8%</b>	<b>0.5%</b>	<b>Neutral</b>
<b>529 Industry</b>	<b>\$172,906</b>	<b>-1.9%</b>	<b>*70%</b>	<b>-</b>

- 529 Advisor-sold Plan assets decreased by 1.9% from Q2 2021 to Q3 2021 and increased by 17.1% year over year
- Connecticut (CHET Advisor) assets decreased by 1.8% and increased by 23.5% respectively during the same time periods

### Direct Sold Market

	Assets (\$M)	% Growth (Q2 2021 to Q3 2021)	Market Share	2021 M* Rating
1. New York	\$36,345	-1.4%	14.1%	Silver
2. Nevada	\$29,693	-0.2%	11.5%	Silver
3. Utah	\$19,961	-0.5%	7.7%	Gold
4. New Hampshire	\$18,028	-1.1%	7.0%	Bronze
5. California	\$12,461	-0.5%	4.8%	Silver
<b>19. Connecticut</b>	<b>\$4,235</b>	<b>-2.1%</b>	<b>1.6%</b>	<b>Bronze</b>
<b>529 Industry</b>	<b>\$258,305</b>	<b>-1.0%</b>	<b>*45%</b>	<b>-</b>

- 529 Direct-sold Plan assets decreased 1.0% from Q2 2021 to Q3 2021 and increased 20.7% year over year
- Connecticut (CHET) assets decreased 2.1% and increased 17.8% respectively during the same time periods

For State Sponsor Use Only

\* Total market share across top five states.

Source: Strategic Insight, Quarterly Update as of 9/30/2021

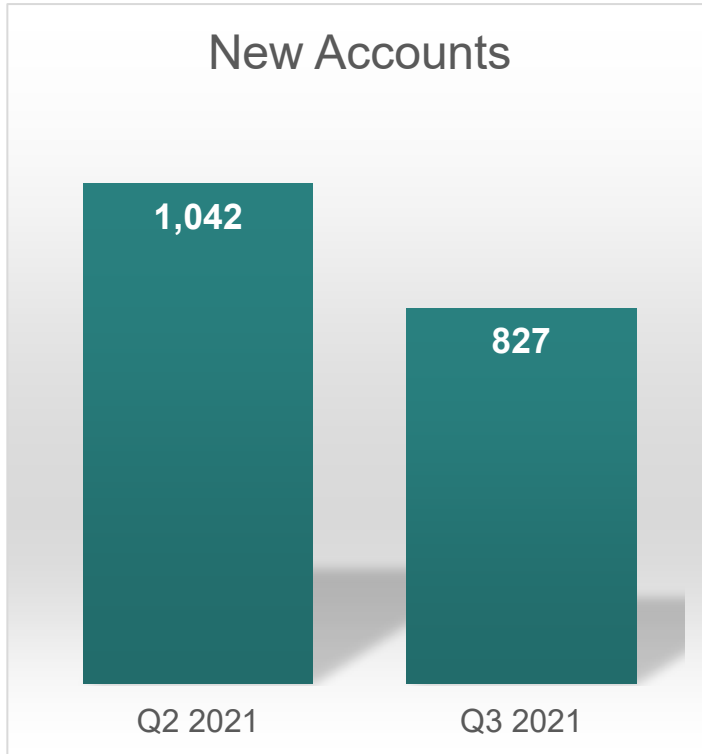
## CHET Advisor 529 Program Update



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# Accounts

***By end of Q3 2021, there were 31,376 total active accounts\*.***



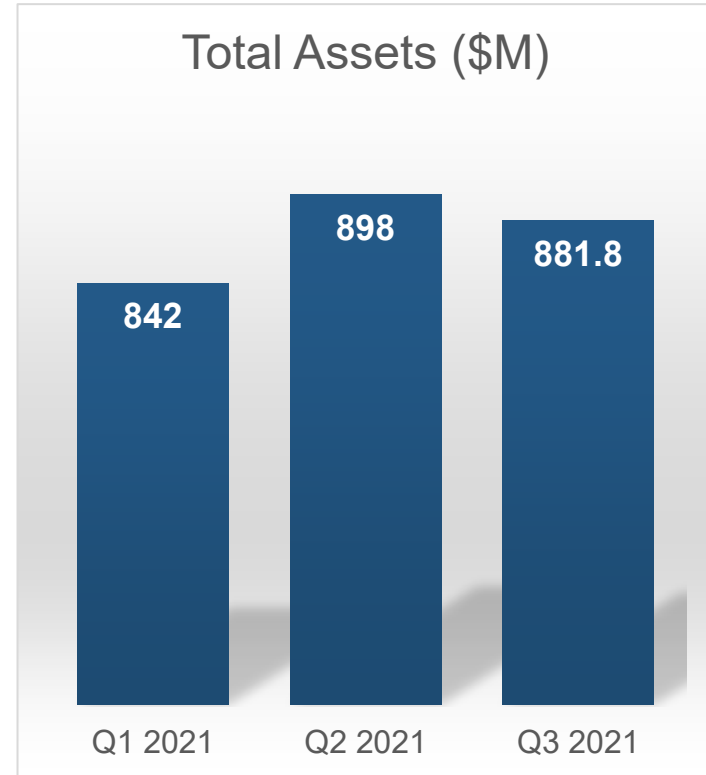
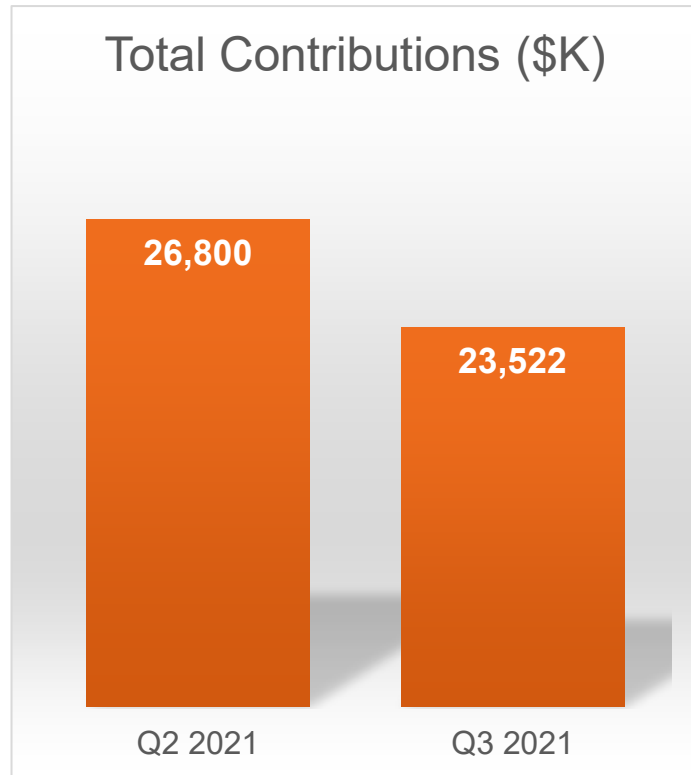
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\*accounts with balances

Source: Fidelity Investments 9/30/2021

# Contributions & Assets

*Assets under Management were at \$881.8M, up 4.7% from Q1 2021.*



For State Sponsor Use Only

Source: Fidelity Investments 9/30/2021

## Assets by Client Firms

Top 5 Client Firms			
Broker Dealer	Assets	% of Total	Accounts
Morgan Stanley Wealth Management	\$91,556,732	15.2%	2,025
Merrill Lynch, Pierce, Fenner & Smith Inc.	\$86,051,883	14.3%	2,254
UBS Financial Services	\$81,376,734	13.6%	1,422
LPL Financial LLC	\$75,538,920	12.6%	3,894
Ameriprise Financial Services	\$64,649,945	10.8%	2,257

Source: Fidelity Investments 9/30/2021

For State Sponsor Use Only

## CHET 529 Direct Program Update



For State Sponsor Use Only

# Executive Summary

## PROGRAM UPDATE

- Account Activation: As of 9/30/21, 83% (113k) of accounts representing 90% (\$3.6B) of converted assets.
- The plan has continued strong year over year growth:
  - Total of 145k accounts, 7% increase over the end of Q3 2020
  - New Accounts, 64% increase over the end of Q3 2020
  - Total assets under management have reached \$4.2B, 18% increase over the end of Q3 2020

## CHET/FIDELITY COLLABORATION

- Scheduled weekly calls in which Fidelity works collaboratively with CHET to report program status, product enhancements and provide guidance on plan details/features as well as receiving critical feedback.

## BABY SCHOLARS

- Baby Scholars has awarded over **\$96,000** in \$100 contributions to qualified accounts opened since 7/1.

## DREAM BIG! COMPETITION

- During 2021, 80 high school seniors and 256 K- 8 students won scholarships totaling \$100, 000 and \$135,424 respectively in the first Dream Big! Scholarship competition at no cost to the state. The winners hail from all eight counties and 5 congressional districts in Connecticut.
- Retained 3<sup>rd</sup> party Competition agency to develop optimal timing and competition parameters to foster increased student and school participation.
- Agency will develop relationships with schools through face-to-face contact to provide educational resources and support for dream big as well as overall financial education.

## MARKETING

- Fidelity marketing focused on expansion of events & sponsorships as well as seasonal communications
- In order to drive the CHET marketing program forward into 2022 with fresh thinking and innovative approaches, Fidelity continues to employ a wide array of resources, such as radio.tv, social media and paid online search as well as an aggressive marketing campaign to drive the message of saving for higher education

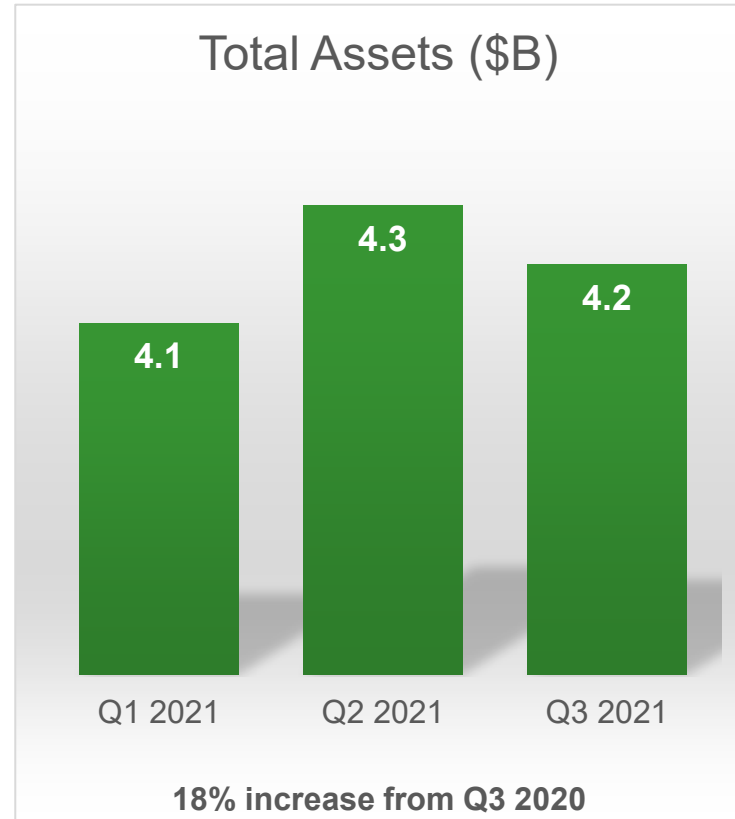
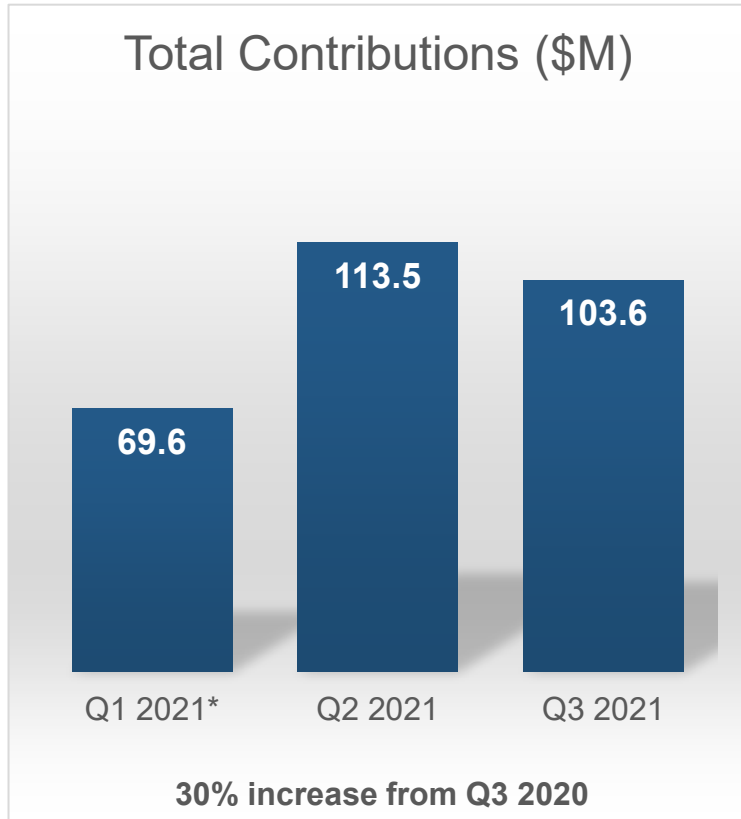
# Accounts\*



For State Sponsor Use Only

- TIAA Quarterly Report 3rd Quarter 2020. Data as of 9/30/2020
- Fidelity Data Source: ORD and CWE as of 6/30/2021
- \*Accounts with balances

# Contributions & Assets



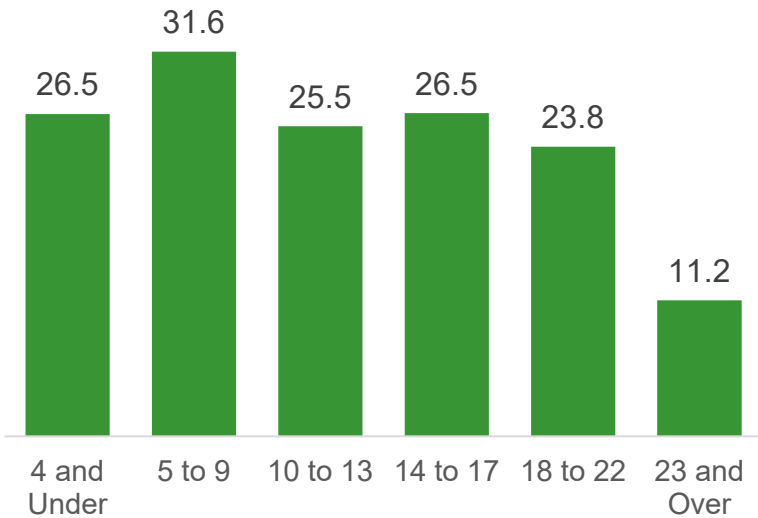
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- TIAA Quarterly Report 3rd Quarter 2020. Data as of 9/30/2020
- Fidelity Data Source: ORD and CWE as of 6/30/2021

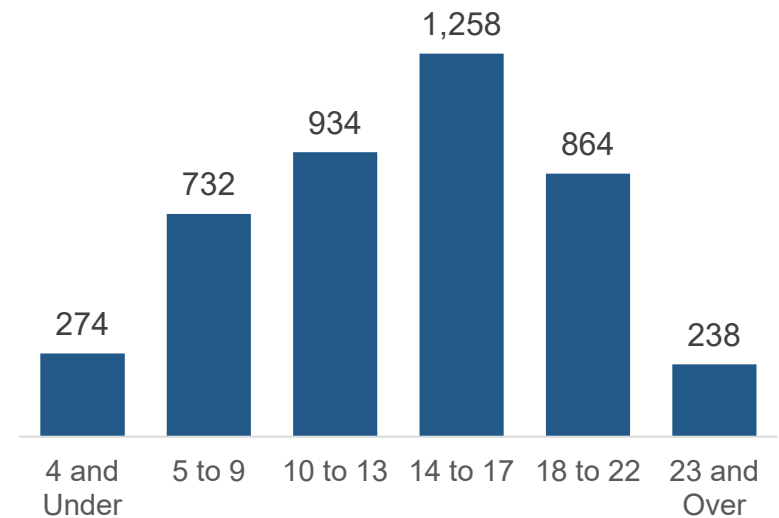
# Age Wave: Accounts and Assets Under Management

- Largest number of accounts with beneficiaries 5-9
- 29% of assets under management held in accounts for beneficiaries preparing for college, 14 to 17

Accounts by Beneficiary Age (k)



AUM by Beneficiary Age (\$M)



# Participant Demographics

- 91% of accounts are in-state
- 33% of Connecticut accounts are in Fairfield county, with an additional 27% in Hartford county
- 62% of participants are between the ages of 35 and 54

Accounts by State	
CT Resident	132 k
Non-Resident	14 k

CT Counties by Number of Accounts	
Fairfield	44 k
Hartford	36 k
New Haven	25 k
Middlesex	7 k
New London	7 k
Tolland	6 k
Litchfield	5 k
Windham	2 k

Accounts by Participant Age Tier	
Under 35	9 k
35 - 44	44 k
45 - 54	48 k
55 - 64	23 k
65 and Over	24 k

Data Source: CWE as of 9/30/2021


















## Product Enhancements

- BillPay enhancements to make higher education payments more intuitive
- Cash transfer page enhancement identifies contribution versus distribution
- Investment Options page streamlined for easier navigation
- Allocation Tile on 529 account landing page portrays allocation breakdown
- Developing Payroll deduction process for CT state employees
- Stable Value Fund launch 4/1
- Recent hiring of new College Planning Associates
- Updating the 529 Gifting certificate and process


























# Appendix

# 2021 CHET Ongoing Channel Activations

11/8 – All TSW creative out of market

	JULY	AUG	SEP	OCT	NOV	DEC	JAN	
TV	 NETWORK, CABLE, OTT <i>July 19 – Aug 1</i>	 NETWORK, CABLE, OTT <i>Aug 16 – Sept 5</i>	CBA TESTING FOR Q4/Q1 TV SPOTS	 NETWORK, CABLE, OTT <i>Sept 20 – Oct 3</i>			 * NEW TV SPOTS TO LAUNCH PENDING CBA TESTING	
PAID SEARCH	  PAID SEARCH	→						
ORGANIC SOCIAL	    ORGANIC SOCIAL POSTS	→						
SOCIAL & DISPLAY		PAID SOCIAL AND DISPLAY LAUNCH	 	 Savingforcollege.com	 Display & Video 360	→		
RADIO								
FID.COM		 OPTIMIZE POST LOG-IN EXPERIENCE	→					
































# 2021 CHET Special Programs and Seasonal Opportunities

	JULY	AUG	SEP	OCT	NOV	DEC		
EMAIL & DIRECT MAIL	 GENERAL * DISTRIBUTION <i>Service EM</i>	 DOB (DATE OF BIRTH) TRIGGER <i>Marketing EM</i>	 DREAM BIG DEADLINE REMINDER <i>EM</i>			 BILLPAY DISTRIBUTION <i>Service EM</i>	 YE TAX DEDUCTION <i>Service EM</i>	
PUBLIC RELATIONS	 BABY SCHOLARS <i>Quiet re-launch</i>	 COLLEGE STUDY	 DREAM BIG DEADLINE REMINDER		 DREAM BIG WINNERS 11/1	 COLLEGE GIFTING	 END OF YEAR TAX SAVINGS	
EVENTS	 BOYS & GIRLS CLUB	 SUMMER CAMP EVENTS	 VACCINATION DRIVE EVENTS	 HYG CHET NIGHT	 SCHOOL SUPPLY DONATIONS	 FINANCIAL LITERACY WORKSHOP 9/TBD	 L&P LUNCH & LEARN AND SYMPOSIUM	 READ TO GROW
ORGANIC SOCIAL		 BACK TO SCHOOL	 COLLEGE SAVINGS MONTH LOCAL COMMUNITY LEADERS HIGHLIGHT		 DREAM BIG WINNERS	 END OF YEAR TAX SAVINGS		
FID.COM	 BABY SCHOLARS <i>Page re-launch</i>				 DREAM BIG WINNERS			

# 2022 Channel Plan - Ongoing

	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
TV	 NETWORK, CABLE, OTT											
PAID SEARCH	 SEARCH											
ORGANIC SOCIAL	 ORGANIC SOCIAL POSTS											
SOCIAL & DISPLAY	         											
Out of Home												

# 2022 Channel Plan – Special Programs & Seasonal Opportunities

	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	
EMAIL	 <b>BABY SCHOLARS WELCOME Trigger + DOB Trigger</b> <i>Ongoing Marketing EMs</i>			 <b>PPIO ROLLDOWN</b> <i>Service EM</i>			 <b>GENERAL DISTRIBUTION</b> <i>Service EM</i>		 <b>DREAM BIG LAUNCH</b> <i>Marketing EM</i>		 <b>DREAM BIG DEADLINE REMINDER</b> <i>Marketing EM</i>	 <b>BILLPAY DISTRIBUTION</b> <i>Service EM</i>	 <b>YE TAX DEDUCTION</b> <i>Marketing EM</i>
PR	 <b>WELCOME TO CHET: "JUST START" MEDIA DAY</b>					 <b>SUMMER FLAGSHIP 529 STUDY</b>		 <b>COLLEGE STUDY</b>	 <b>DREAM BIG LAUNCH</b>		 <b>DREAM BIG DEADLINE REMINDER</b>	 <b>COLLEGE GIFTING</b>	 <b>END OF YEAR TAX SAVINGS</b>
EVENTS	 <b>WELCOME TO CHET: "JUST START" MEDIA DAY</b>						 <b>SUMMER CAMP EVENTS</b>		 <b>DREAM BIG LAUNCH</b>				
ORGANIC SOCIAL	 <b>HOLIDAYS</b> <i>New Years Day, MLK Day, Three Kings Day</i>	 <b>BLACK HISTORY MONTH</b>	 <b>WOMEN'S HISTORY MONTH</b>	 <b>NAT'L FINANCIAL LITERACY MONTH</b>	 <b>529 DAY</b>	 <b>SUMMER FLAGSHIP 529 STUDY</b>		 <b>BACK TO SCHOOL</b>	 <b>COLLEGE SAVINGS MONTH</b>	 <b>DREAM BIG LAUNCH</b>	 <b>WORLD TEACHER'S DAY</b>	 <b>DREAM BIG DEADLINE REMINDER</b>	 <b>END OF YEAR TAX SAVINGS</b>
FID.COM						 <b>SUMMER FLAGSHIP 529 STUDY</b>			 <b>DREAM BIG LAUNCH</b>				

# CHET: New Accounts

- Total of 4,267 new accounts opened in Q3 2021
- 59% of new accounts are from participants with an existing relationship with Fidelity

New Account by State	
CT Resident	4,110
Non-Resident	157

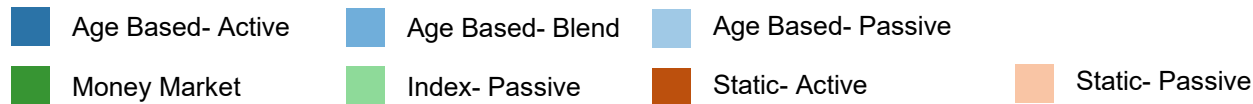
New Account by Point Of Entry	
Existing PI Retail Client	2,198
Existing Workplace Client (401k)	317
New to Fidelity	1,752

New Accounts by Beneficiary Age Tier	
4 and Under	2,101
5 - 9	729
10 - 13	475
14 - 17	407
18 - 22	321
23 +	234

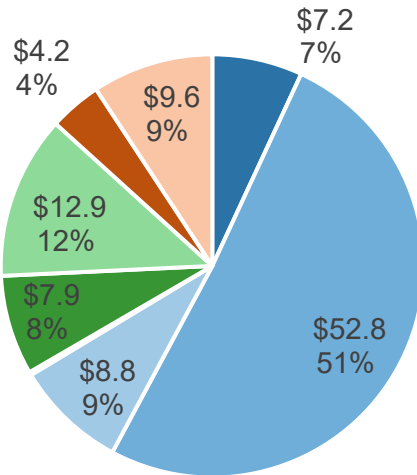
New Accounts by Participant Age Tier	
Under 35	882
35 - 44	1,591
45 - 54	830
55 - 64	438
65 and Over	475
Unknown	51

# CHET Contributions

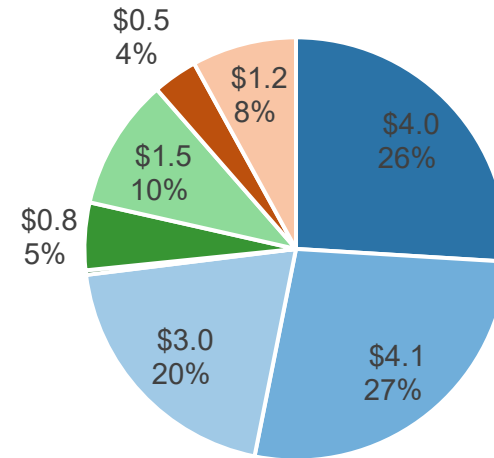
- Total Q3 contributions totaled \$103.6M
- \$15.2M in rolling 30-day contributions made in Q3 by new accounts



**All Contributions (\$103.6M)**



**New Account 30-day Contributions (\$15.2 M)**



\* Bank deposit contributions negligible

\*\* New Account Contributions defined as contributions made during the month made by new accounts. The establish date for the new accounts may cross months/quarters.

Fidelity Data Source: ORD as of 9/30/2021

# Important Information

**The Connecticut Higher Education Trust (CHET) 529 College Savings Plan (Direct Plan and Advisor Plan) is offered by the state of Connecticut. If you or the designated beneficiary is not a Connecticut resident, you may want to consider, before investing, whether your state or the beneficiary's home state offers its residents a plan with alternate state tax advantages or other state benefits such as financial aid, scholarship funds and protection from creditors.**

**Effective February 8, 2021 and March 22, 2021, Fidelity became the program manager of the Direct Plan and Advisor Plan, respectively.**

**Units of the portfolios are municipal securities and may be subject to market volatility and fluctuation.**

**Please carefully consider the plan's investment objectives, risks, charges, and expenses before investing. For this and other information on any 529 college savings plan managed by Fidelity, contact Fidelity for a free Fact Kit, or view one online. Read it carefully before you invest or send money.**

*You could lose money by investing in the fund. Although the fund seeks to preserve the value of your investment at \$1.00 per share, it cannot guarantee it will do so. An investment in the fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Fidelity Investments and its affiliates, the fund's sponsor, have no legal obligation to provide financial support to the fund, and you should not expect that the sponsor will provide financial support to the fund at any time.*

The fund will not impose a fee upon the sale of your shares, nor temporarily suspend your ability to sell shares if the fund's weekly liquid assets fall below 30% of its total assets because of market conditions or other factors.

Fidelity does not provide legal or tax advice. The information herein is general in nature and should not be considered legal or tax advice. Consult an attorney or tax professional regarding your specific situation.

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# CHET 529 College Savings Program

# CHET Advisor 529 College Savings Program

Q3 2021 Review



# Our Philosophy and Quarterly Updates

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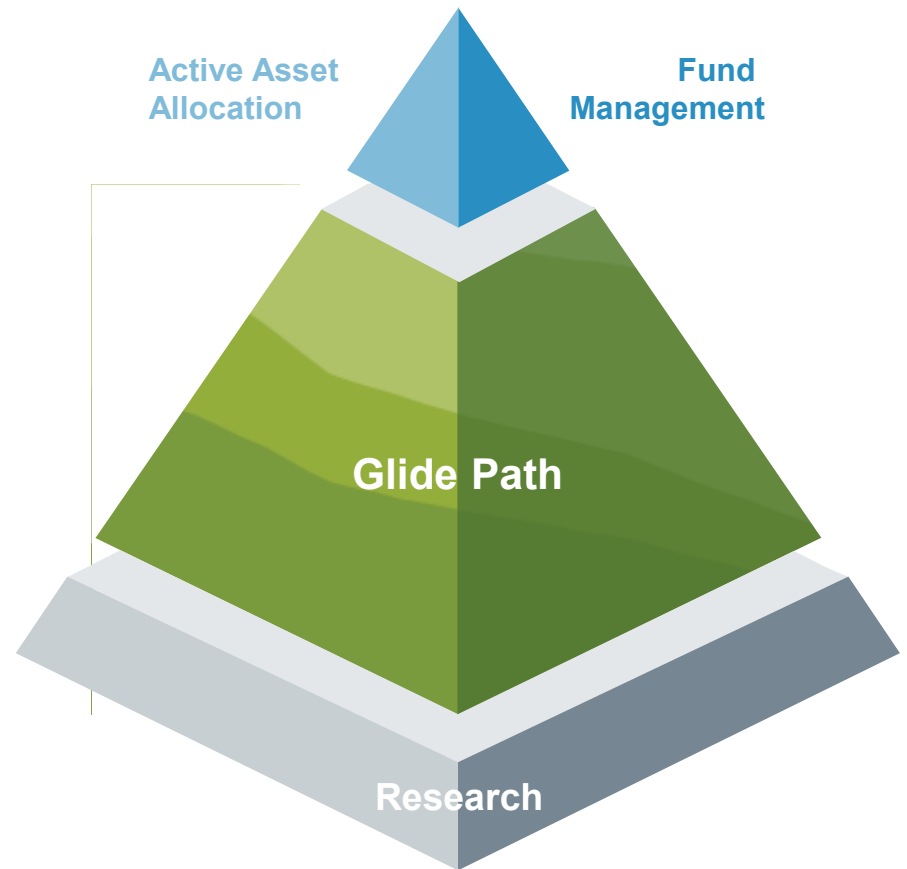
# Investment Philosophy and Process

College savings is a long-term challenge that requires a clear understanding of participants and a firm-wide commitment to helping provide better outcomes

**College investment strategies are designed to help investors solve the challenge of investing for college**

**We believe that achieving success requires:**

- Research on the key drivers of college savings, including capital markets, and participant demographics and behavior
- A strategic glide path that reflects the key drivers of long-term outcomes
- Complemented by active allocation and fund management seeking to incrementally improve results
- All supported by robust research capabilities



# Active Management

Skilled active managers can help incrementally improve outcomes



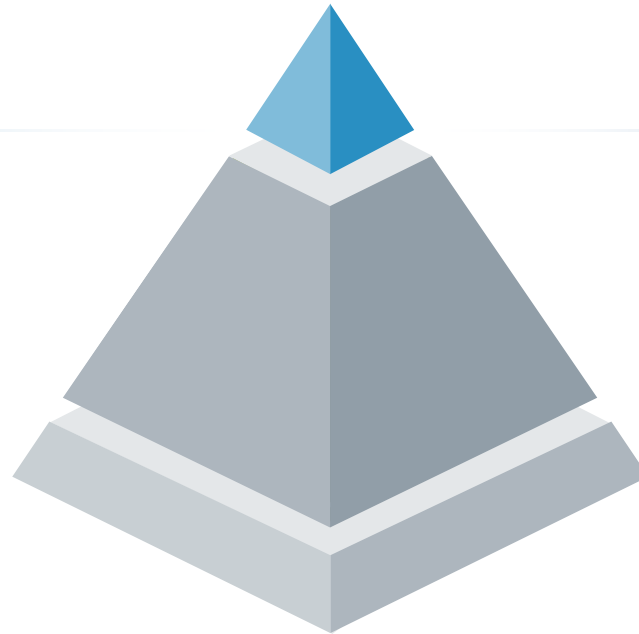
## Active Asset Allocation

### Philosophy

- Asset mispricing can occur due to investors' behavioral biases and time horizon differences
- There are opportunities to take advantage of mispricing through a contrarian approach where our view differs from the expectations embedded in asset prices

### Objective

- Help improve outcomes through adjustments across and within asset classes over an intermediate term horizon
- Potential long-term incremental return expectations of 0.25–0.50% with tracking error of 0.50–1.50%



## Underlying Managers

### Philosophy

- Security selection provides the most efficient form of alpha
- Take advantage of security level mispricing with a differentiated view of future cash flow potential relative to current price

### Objective

- Combine complementary strategies that amplify Fidelity's investment edge and add value over benchmarks
- Potential long term incremental return expectations of 0.25–0.75% with tracking error of 0.50–2.00%

Diversification does not ensure a profit or guarantee against a loss.

For illustrative purposes only.

Although Fidelity believes it has a reasonable basis for any target return, there can be no assurance that actual results will be comparable

**Past performance is no guarantee of future results.**

# CHET 529 College Savings Plan & CHET Advisor 529 Plan Highlights

As of September 30, 2021

## Quarterly Recap

- Global economic expansion continued but virus and supply disruptions weighed on momentum with asset prices largely unchanged
  - Commodities +6.6%
  - Non-U.S. Small Cap Stocks +0.9%
  - U.S. Small Cap Stocks -4.4%
  - Emerging Market Stocks -8.1%
- China's deceleration & regulatory tightening are the greatest risk to global growth
- Supply side constraints appear to be less transitory than expected
- Nominal yields unchanged, real yields still negative

## Portfolio Performance

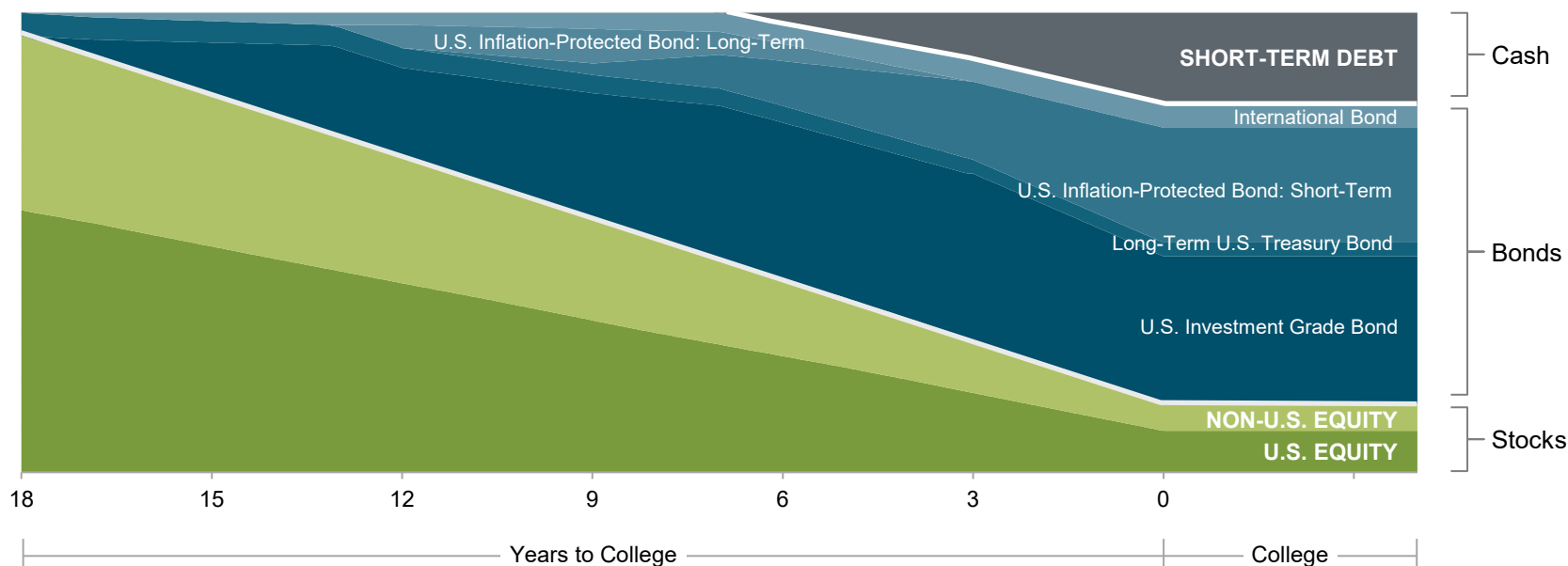
- During the quarter, static portfolio performance was mixed while active and blend age-based portfolios underperformed their benchmarks driven by:
  - Overweight to and underlying managers of Emerging-Market Equities
- Over the one-year period, all the active age-based, blend age-based and static portfolios outperformed their benchmarks driven by:
  - Underlying U.S. Equities managers
  - Underweight to and underlying managers of Investment Grade Debt
  - Allocation to Commodities
  - Overweight to Emerging-Markets Equities
- Over the three & five-year periods, all but one active age-based and static portfolios outperformed their benchmarks driven by:
  - Overweight to and underlying managers of Non-U.S. Equities
  - Underlying managers of U.S. Equities
  - Underweight to and underlying managers of Investment Grade Debt
- Fidelity Index Portfolios performed in line with expectations for the quarter

## Current Positioning

- Equity markets are more fairly valued, although risks of near peak corporate profit margins have trended higher. We have an overweight position in equities relative to the composite benchmark.
- Within equities, positioning emphasizes emerging markets based on attractive valuations, weak sentiment, and improving structural trends relative to developed market economies. We view EME as having a more favorable distribution of outcomes relative to US equities, which are starting from a higher valuation point.
- Inflation-sensitive assets are attractively valued and sentiment is bearish following a long period of low inflation. Against the backdrop of accommodative monetary and fiscal policy, market participants may be mispricing the potential for inflation.
- Yields on sovereign bonds have increased from historic lows, but the distribution of potential outcomes supports an underweight to sovereign bonds.

# CHET 529 College Savings Plan Age-Based Portfolios Strategic Asset Allocation

## ACTIVE AGE-BASED 529 PORTFOLIOS ASSET ALLOCATION ROLLDOWN\*

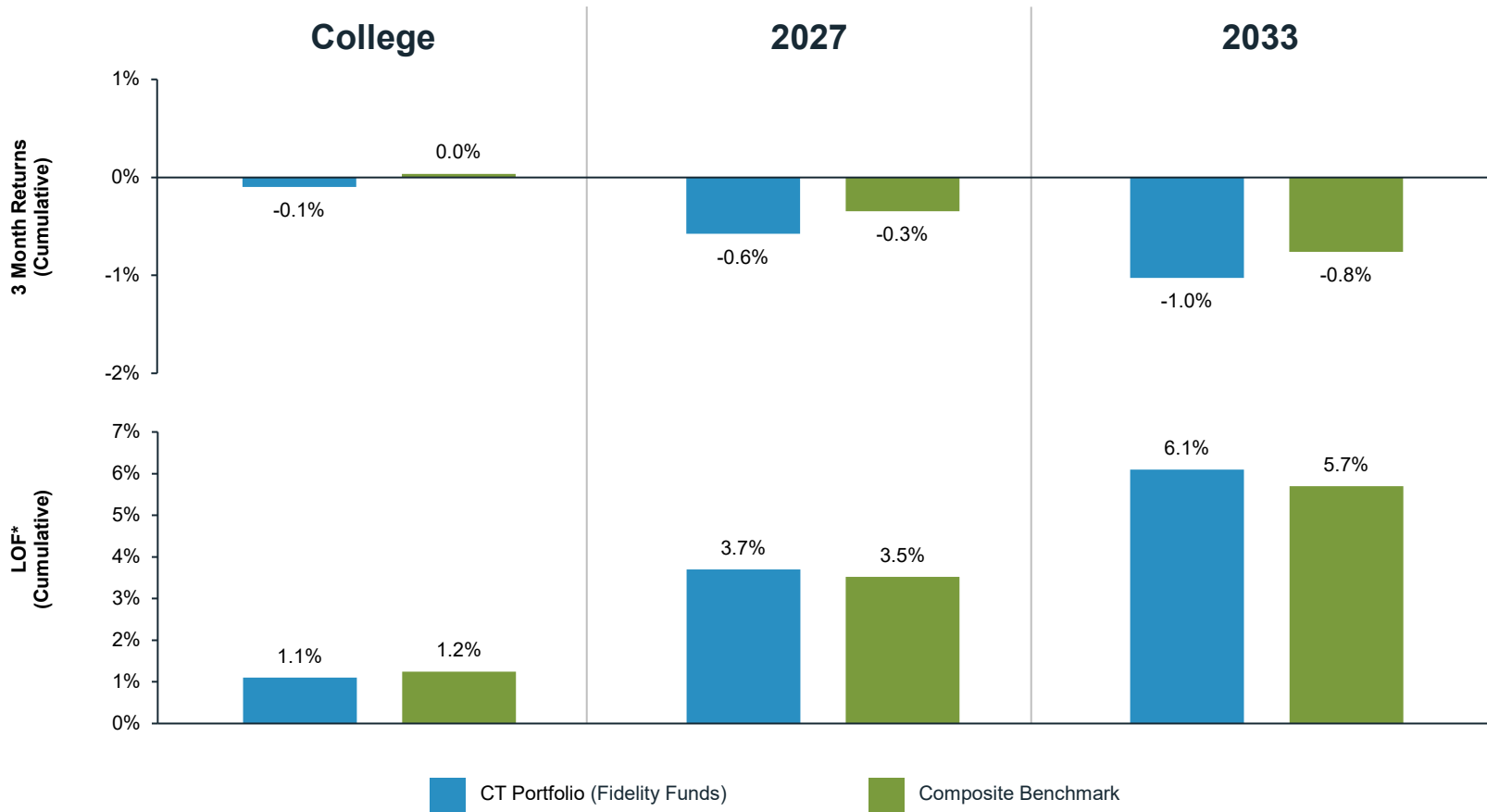


Strategic Asset Allocation %	Years to College						College
	18	15	12	9	6	3	0
U.S. Equity	57.0	49.2	41.1	33.1	25.3	17.3	9.0
Non-U.S. Equity	38.0	32.8	27.4	22.0	16.9	11.5	6.0
U.S. Investment Grade Bond	0.0	11.6	19.5	27.4	34.0	36.2	32.0
Long Term U.S. Treasury Bond	5.0	4.7	4.3	4.0	3.7	3.0	3.0
U.S. Inflation-Protected Bond: Short-Term	0.0	0.0	0.0	2.5	9.8	17.0	25.0
U.S. Inflation-Protected Bond: Long-Term	0.0	0.0	5.0	7.5	3.8	0.0	0.0
International Bond	0.0	1.8	2.6	3.5	4.3	5.0	5.0
Short-Term Debt	0.0	0.0	0.0	0.0	2.5	10.0	20.0

\*The glide path depicted represents an updated asset allocation strategy, with the transition expected to be completed by Q3 2022. Percentages may not total 100% due to rounding. Diversification does not ensure a profit or guarantee against a loss.

# CT 529 Active Age-Based Performance Summary

As of September 30, 2021



Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

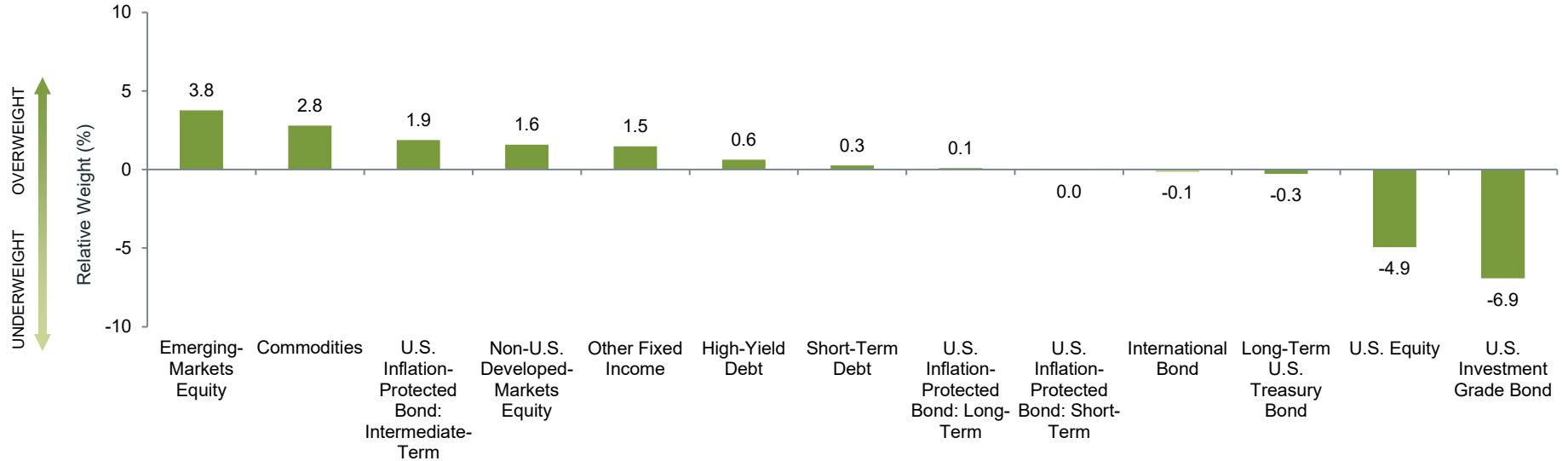
Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.fidelity.com](http://www.fidelity.com).**

# Current Positioning and Views

## CT Portfolio 2027 (Fidelity Funds)

### BENCHMARK RELATIVE ASSET CLASS EXPOSURE

AVERAGE EXPOSURE THROUGHOUT SEPTEMBER 2021



Equity markets are more fairly valued, although risks of near peak corporate profit margins have trended higher. We have an **overweight position in equities** relative to the composite benchmark.

**Within equities, positioning emphasizes emerging markets** based on attractive valuations, weak sentiment, and improving structural trends relative to developed market economies. We view EME as having a more favorable distribution of outcomes relative to US equities, which are starting from a higher valuation point.

**Inflation-sensitive assets are attractively valued** and sentiment is bearish following a long period of low inflation. Against the backdrop of accommodative monetary and fiscal policy, market participants may be mispricing the potential for inflation.

**Yields on sovereign bonds have increased from historic lows**, but the distribution of potential outcomes supports an underweight to sovereign bonds.

Active weights above reflect the difference between the average fund weights of an asset class less the average benchmark weight for each respective asset class during the month. Other Fixed Income includes Real Estate Debt, Floating Rate Debt, and Emerging Market Debt. LT Treasuries were previously classified under Investment Grade, but it became its own asset class as part of the most recent product update.

Source: Fidelity Investments, as of 9/30/21.

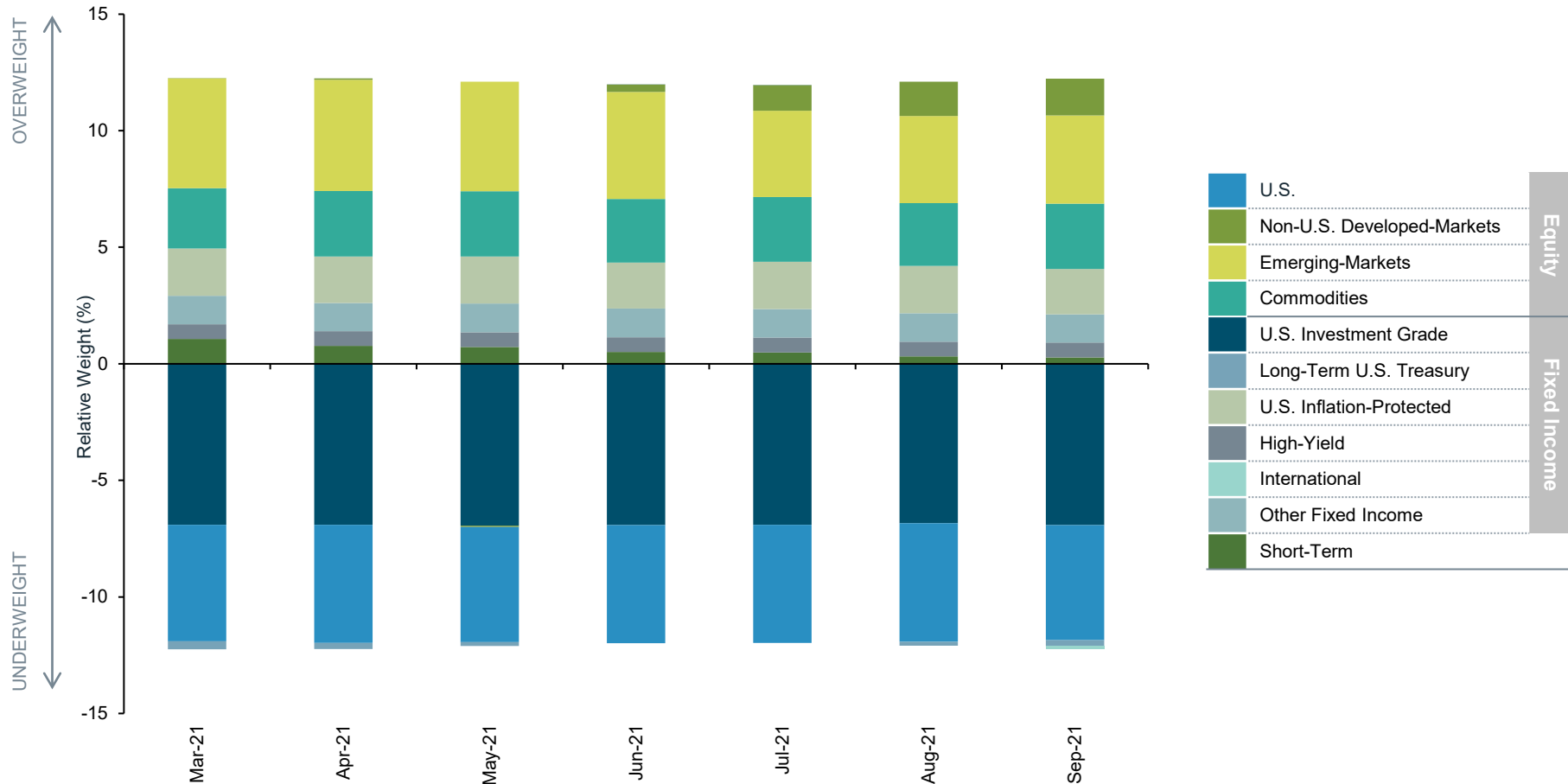
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# Benchmark Relative Asset Class Exposure

## CT Portfolio 2027 (Fidelity Funds)



Benchmark Relative Asset Class Exposures above reflect the difference between the average fund weight less the average benchmark weight for each respective asset class for each one-month period. Other Fixed Income includes Real Estate Debt, Floating Rate Debt, International Debt, and Emerging Market Debt.

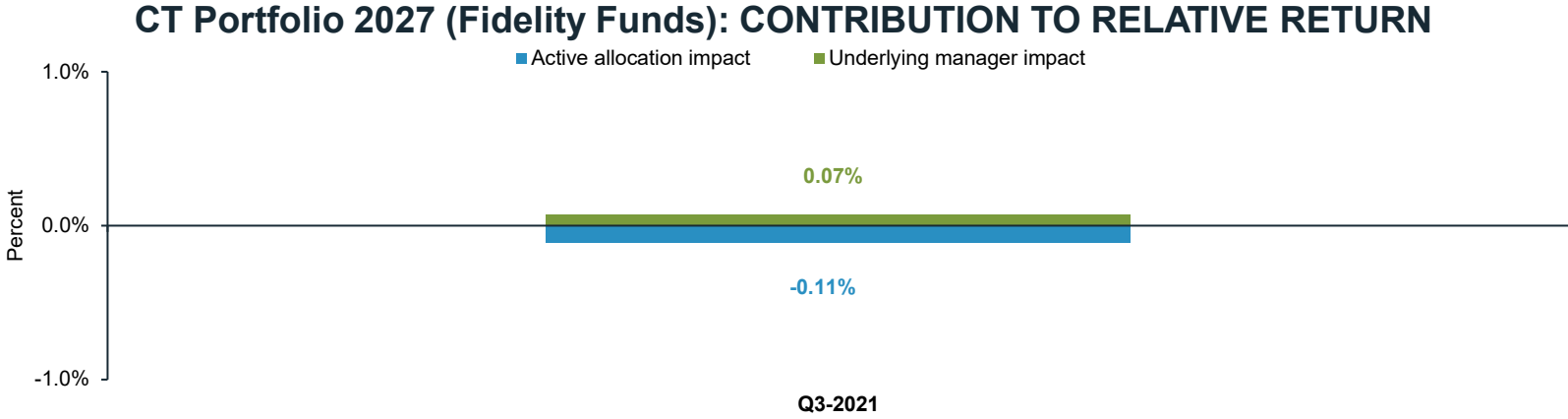
Source: Fidelity Investments, as of 9/30/21.

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# CT Portfolio 2027 (Fidelity Funds)—Attribution

As of September 30, 2021



#### HELPED

- Underlying managers of Developed Markets equities
  - Allocation to Commodities

#### HURT

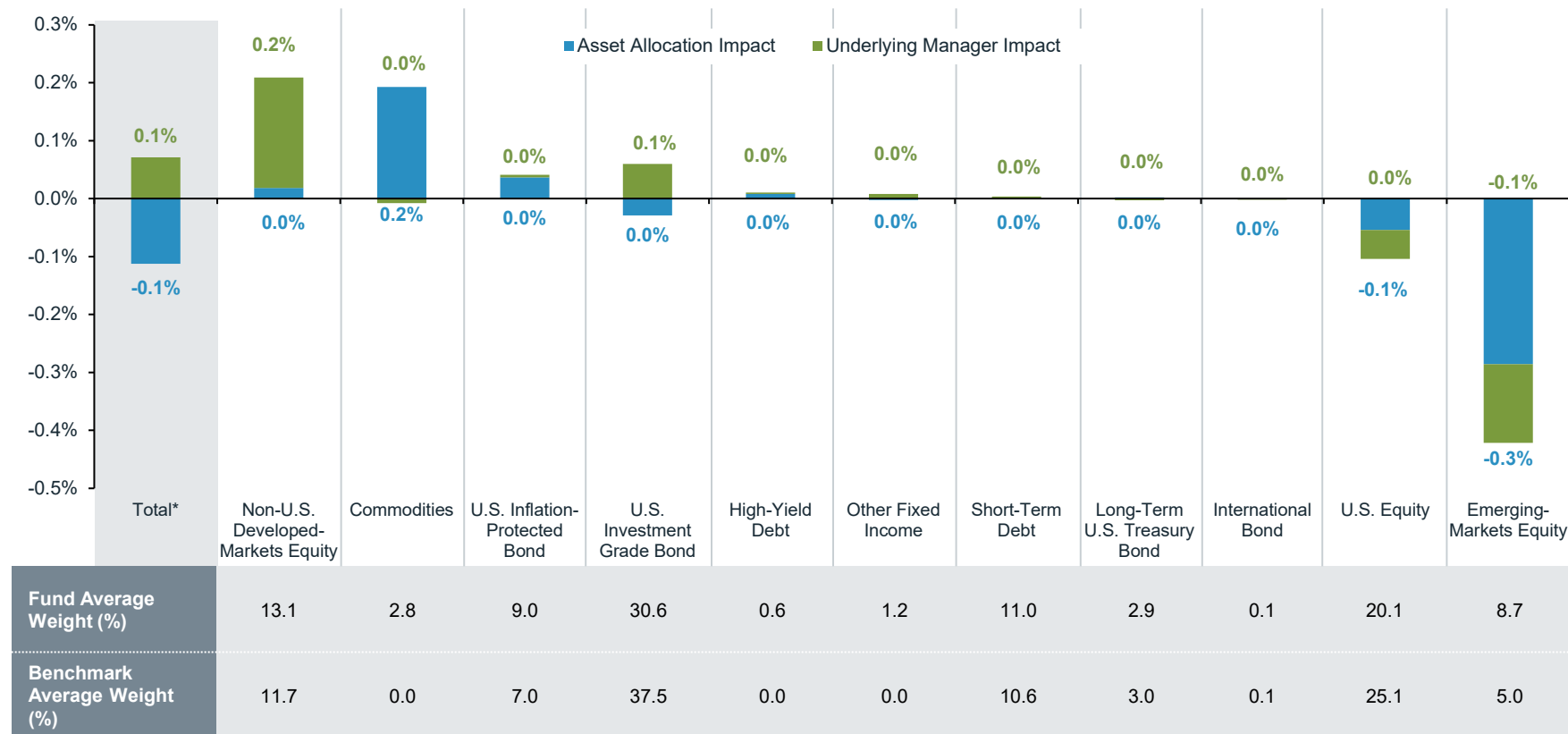
- Overweight to and underlying managers to Emerging Markets equities



# CT Portfolio 2027 (Fidelity Funds) Performance Attribution

## Three Months Ended September 30, 2021

### CONTRIBUTION TO RELATIVE RETURN BY ASSET CLASS



Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results. Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.** Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.fidelity.com](http://www.fidelity.com).** It is not possible to invest directly in an index. All market indices are unmanaged. Index performance is not meant to represent that of any Fidelity mutual fund. Total returns are historical and include change in share value and reinvestment of dividends and capital gains, if any. These figures do not include the effect of sales charges, if any. If sales charges were included, returns would have been lower. Accounting/timing adjustments are also excluded. The CT Portfolio 2027 (Fidelity Funds) example is shown as it had allocations to all underlying asset classes as of the stated reporting period and is not representative of the asset class allocation percentages of the other CT Portfolio (Fidelity Funds), which vary.

# CT Portfolio (Fidelity Funds) Allocations

As of September 30, 2021

## BENCHMARK ALLOCATIONS<sup>1</sup>

	2039	2036	2033	2030	2027	2024	2021	College	Agrsv Growth	Mod Growth	Consrv
U.S. Equity	56.2%	48.1%	40.1%	31.9%	24.2%	16.3%	8.7%	8.7%	59.7%	41.4%	0.0%
Non-U.S. Equity	38.0%	32.6%	27.1%	21.6%	16.4%	11.0%	5.9%	5.9%	40.3%	28.0%	0.0%
U.S. Investment Grade Bond	2.5%	15.9%	26.1%	32.3%	37.8%	42.2%	36.6%	36.6%	0.0%	24.1%	30.9%
Long-Term U.S. Treasury Bond	3.2%	3.2%	3.1%	3.1%	3.0%	3.0%	2.9%	2.9%	0.0%	3.1%	2.9%
U.S. Inflation-Protected Bond: Short-Term	0.0%	0.0%	0.0%	0.3%	1.0%	1.8%	2.5%	2.5%	0.0%	0.0%	1.0%
U.S. Inflation-Protected Bond: Intermediate-Term	0.0%	0.0%	2.6%	4.4%	6.2%	8.0%	9.1%	9.1%	0.0%	2.8%	9.0%
U.S. Inflation-Protected Bond: Long-Term	0.0%	0.0%	0.5%	0.7%	0.4%	0.0%	0.0%	0.0%	0.0%	0.3%	0.5%
International Bond	0.0%	0.2%	0.3%	0.4%	0.4%	0.5%	0.5%	0.5%	0.0%	0.3%	0.5%
Short-Term Debt	0.0%	0.0%	0.2%	5.2%	10.5%	17.3%	33.9%	33.9%	0.0%	0.0%	55.2%

## ACTUAL ALLOCATIONS

	2039	2036	2033	2030	2027	2024	2021	College	Agrsv Growth	Mod Growth	Consrv
<i>Composite Benchmark Asset Classes</i>											
U.S. Equity	51.6%	43.5%	35.4%	27.2%	19.5%	11.5%	3.9%	3.9%	56.1%	37.8%	0.0%
Non-U.S. Equity	42.4%	37.5%	32.1%	26.7%	21.5%	16.2%	11.0%	11.0%	42.6%	30.4%	0.0%
Developed-Markets Equity	27.6%	24.3%	20.4%	16.6%	13.0%	9.2%	5.6%	5.6%	29.2%	20.6%	0.0%
Emerging-Markets Equity	14.9%	13.3%	11.7%	10.0%	8.5%	6.9%	5.4%	5.4%	13.4%	9.8%	0.0%
U.S. Investment Grade Bond	0.0%	8.8%	19.0%	25.3%	30.8%	35.2%	29.6%	29.6%	0.0%	19.1%	25.7%
Long-Term U.S. Treasury Bond	2.8%	2.9%	2.9%	2.8%	2.8%	2.7%	2.7%	2.7%	0.0%	3.1%	2.9%
U.S. Inflation-Protected Bond: Short-Term	0.0%	0.0%	0.0%	0.3%	1.0%	2.1%	3.2%	3.2%	0.0%	0.0%	1.0%
U.S. Inflation-Protected Bond: Intermediate-Term	0.4%	2.0%	4.5%	6.1%	7.9%	9.6%	10.3%	10.2%	0.0%	5.6%	11.4%
U.S. Inflation-Protected Bond: Long-Term	0.0%	0.0%	0.6%	1.1%	0.6%	0.0%	0.0%	0.0%	0.0%	0.2%	1.0%
International Bond	0.0%	0.1%	0.2%	0.3%	0.3%	0.4%	0.4%	0.4%	0.0%	0.2%	0.4%
Short-Term Debt	-0.1%	0.3%	0.5%	5.5%	10.7%	17.6%	34.1%	34.1%	-0.1%	0.0%	55.3%
<b>Total</b>	<b>97.1%</b>	<b>95.1%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>95.3%</b>	<b>95.3%</b>	<b>98.6%</b>	<b>96.6%</b>	<b>97.7%</b>
<i>Out-of-Composite Benchmark Asset Classes</i>											
Commodities	2.8%	3.0%	3.0%	3.0%	2.9%	2.9%	2.9%	2.9%	1.4%	1.4%	0.0%
High-Yield Debt	0.1%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.0%	0.7%	0.9%
Floating-Rate Debt	0.0%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.0%	0.2%	0.2%
Emerging-Markets Debt	0.1%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.0%	0.7%	0.7%
Real Estate Debt	0.0%	0.4%	0.4%	0.4%	0.4%	0.4%	0.4%	0.4%	0.0%	0.5%	0.5%
<b>Total</b>	<b>2.9%</b>	<b>4.9%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>4.7%</b>	<b>4.7%</b>	<b>1.4%</b>	<b>3.4%</b>	<b>2.3%</b>

<sup>1</sup> Benchmark allocations and actual allocations are as of 9/30/21.

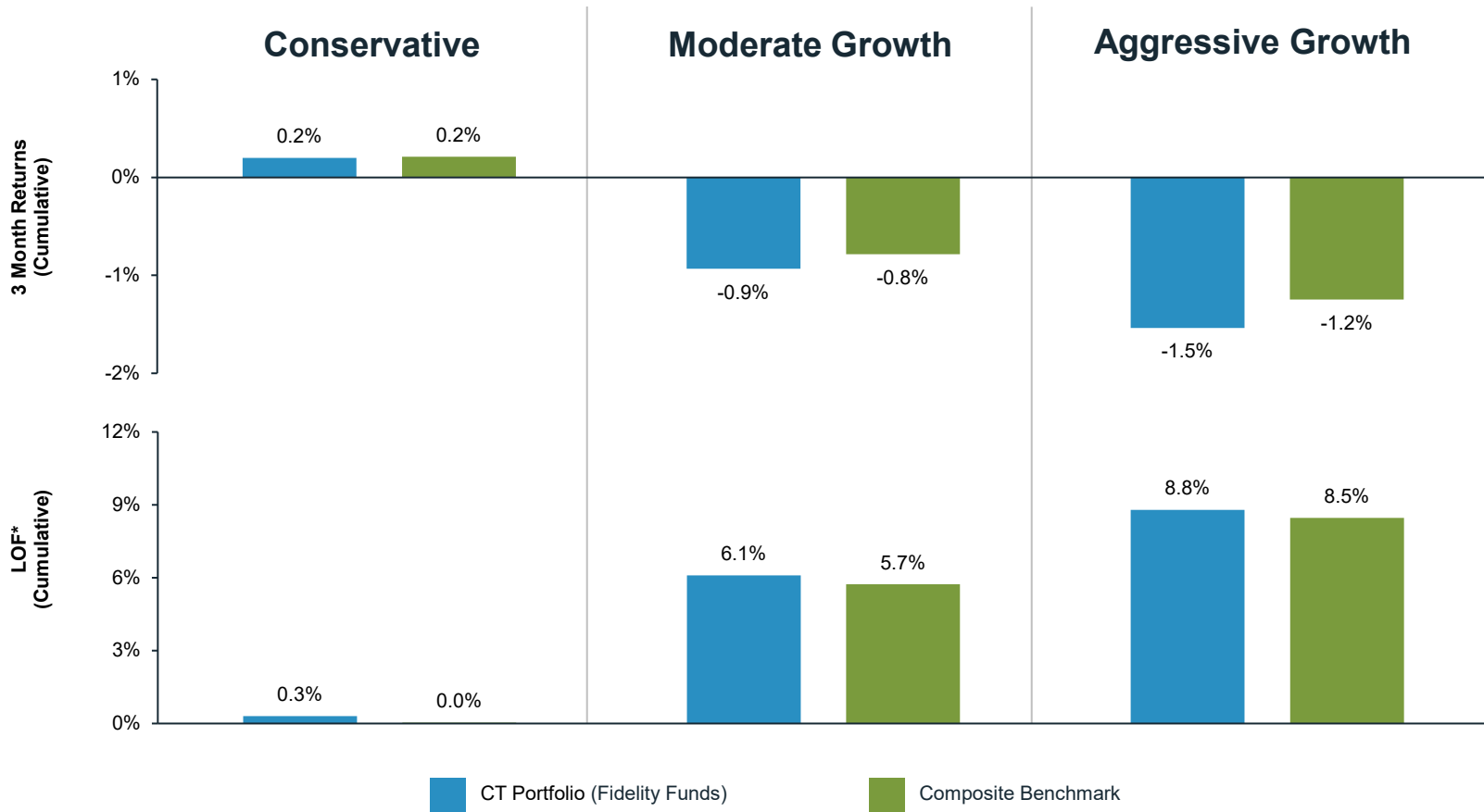
Source: Fidelity Investments. The Adviser may use an active asset allocation strategy to increase or decrease neutral asset class exposures reflected above by up to 10 percentage points for Equity Funds (includes domestic and international equity funds), Bond Funds and Short Term Funds to reflect the Adviser's market outlook, which is primarily focused on the intermediate term. The Adviser may also make active asset allocations within other asset classes (including Commodities, High Yield Debt, Floating Rate Debt, Real Estate Debt, Inflation-Protected Debt, and Emerging Markets Debt) from 0% to 10% individually but no more than 25% in aggregate within those other asset classes. Such asset classes are not reflected in the neutral allocations reflected in the target allocation table above. This strategy may not be successful in adding value, may increase losses to the Fund and/or cause the Fund to have a risk profile different than that portrayed above from time to time.

# Performance Deep Dive

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# CT 529 Active Static Performance Summary

As of September 30, 2021



Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

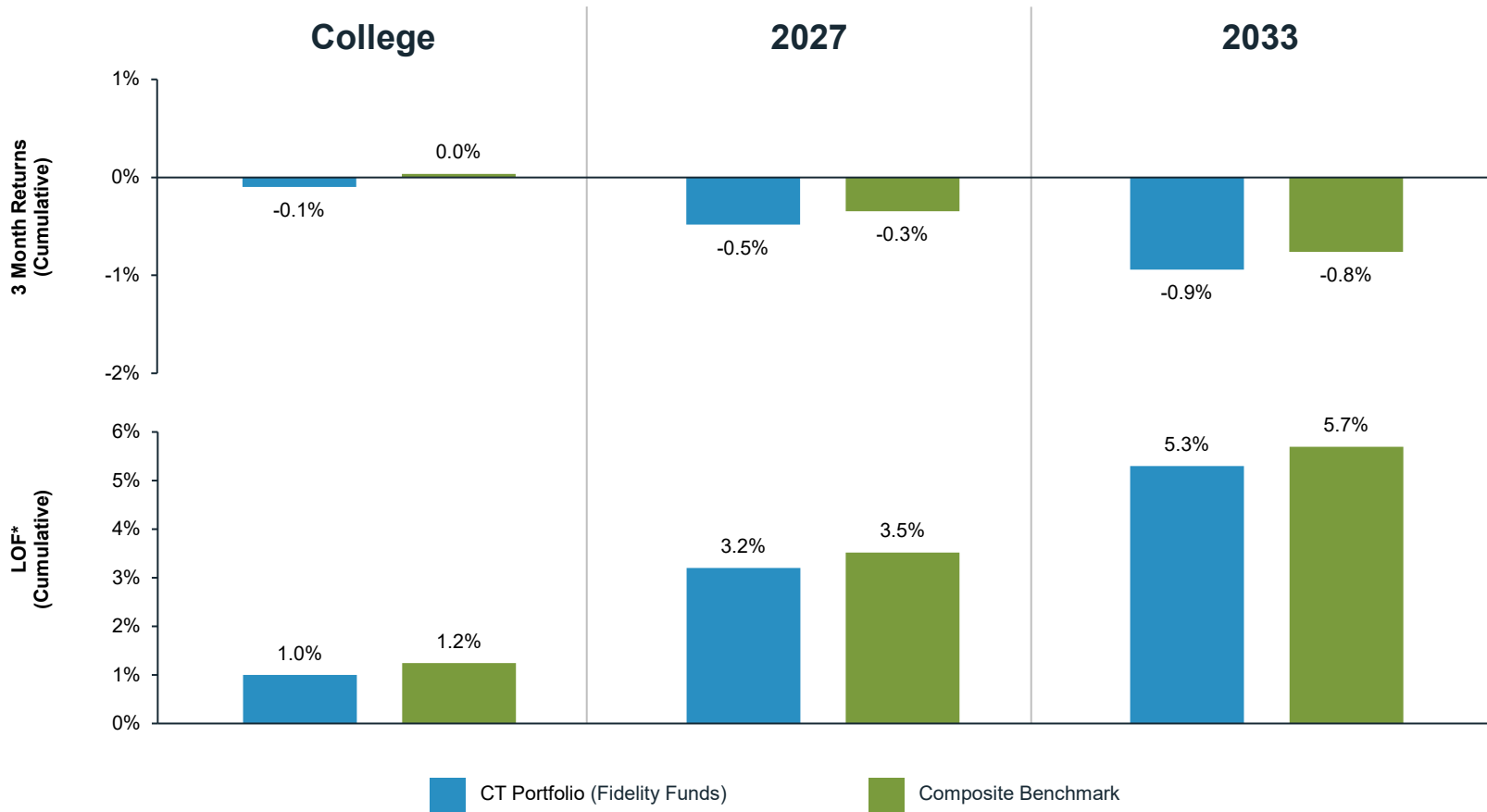
Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.fidelity.com](http://www.fidelity.com).**

# CT 529 Index Age-Based Performance Summary

As of September 30, 2021



Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

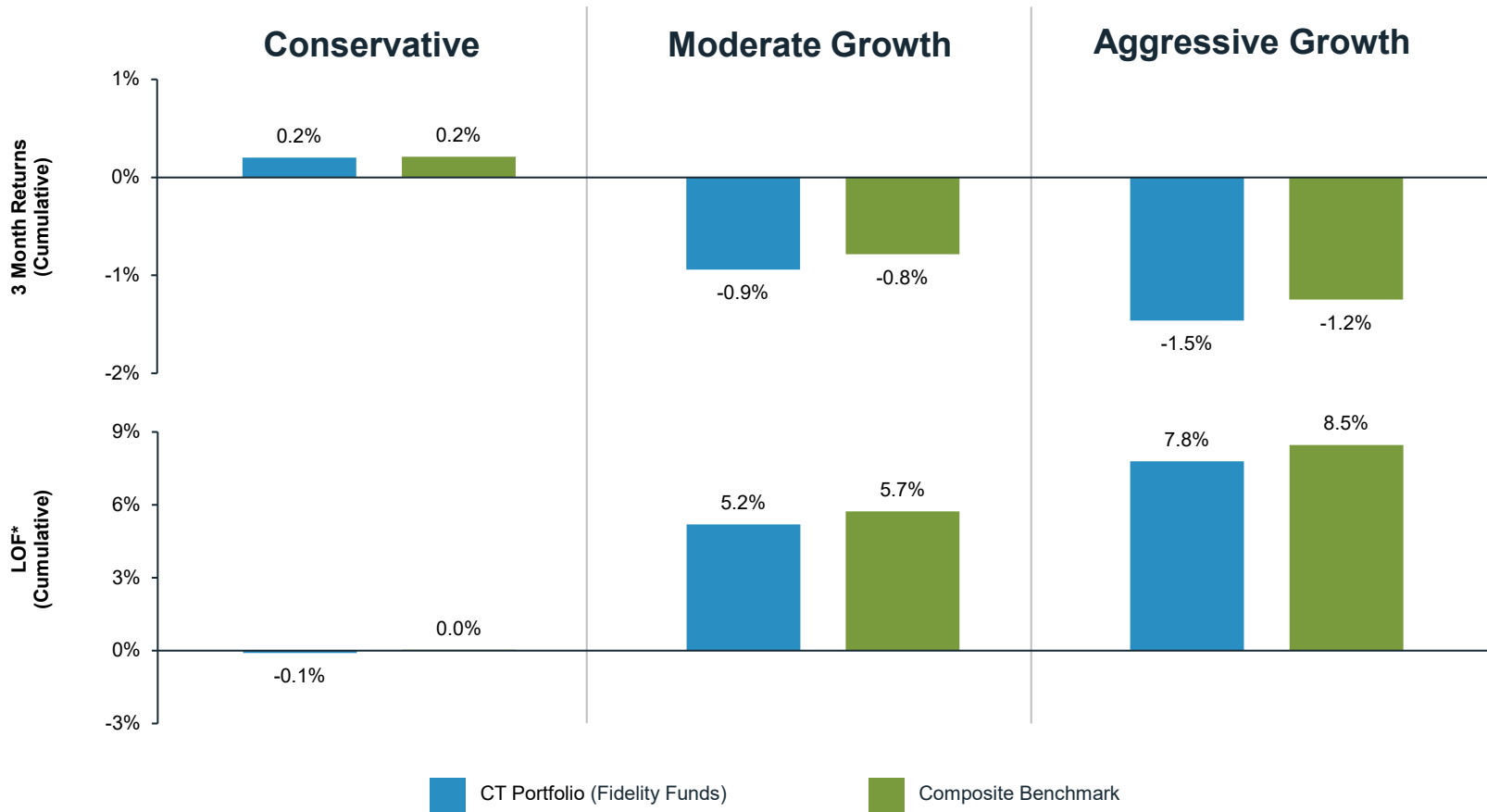
Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

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# CT 529 Index Static Performance Summary

As of September 30, 2021



Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

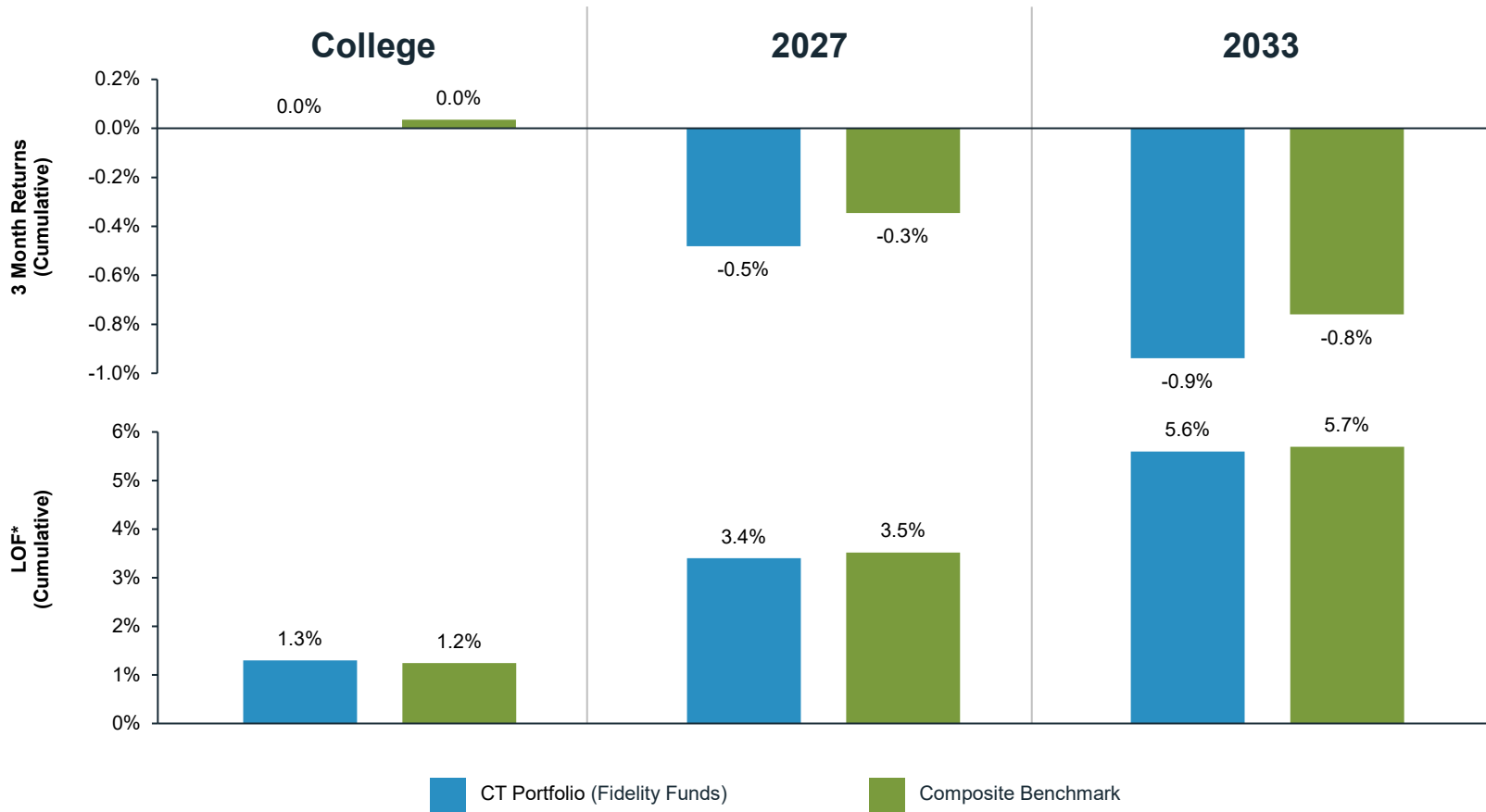
Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

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# CT 529 Blend Age-Based Performance Summary

As of September 30, 2021



Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.fidelity.com](http://www.fidelity.com).**

# CT 529 Active Age-Based and Static Portfolios (Fidelity Funds)

Performance as of September 30, 2021

	Total Return %		Annualized				LOF*	Inception Date
	3M	YTD	1-Year	3-Year	5-Year	10-Year		
CT 529 Portfolio 2039 (Fid Funds)	-1.55	--	--	--	--	--	8.20	2/2/2021
CT 529 Portfolio 2039 Portfolio BM	-1.16	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.39</b>	--	--	--	--	--	--	
CT 529 Portfolio 2036 (Fid Funds)	-1.29	--	--	--	--	--	7.40	2/2/2021
CT 529 Portfolio 2036 Portfolio BM	-0.98	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.31</b>	--	--	--	--	--	--	
CT 529 Portfolio 2033 (Fid Funds)	-1.03	--	--	--	--	--	6.10	2/2/2021
CT 529 Portfolio 2033 Portfolio BM	-0.76	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.27</b>	--	--	--	--	--	--	
CT 529 Portfolio 2030 (Fid Funds)	-0.76	--	--	--	--	--	4.90	2/2/2021
CT 529 Portfolio 2030 Portfolio BM	-0.55	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.21</b>	--	--	--	--	--	--	
CT 529 Portfolio 2027 (Fid Funds)	-0.58	--	--	--	--	--	3.70	2/2/2021
CT 529 Portfolio 2027 Portfolio BM	-0.35	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.23</b>	--	--	--	--	--	--	
CT 529 Portfolio 2024 (Fid Funds)	-0.29	--	--	--	--	--	2.50	2/2/2021
CT 529 Portfolio 2024 Portfolio BM	-0.13	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.16</b>	--	--	--	--	--	--	
CT 529 Portfolio 2021 (Fid Funds)	-0.20	--	--	--	--	--	1.20	2/2/2021
CT 529 Portfolio 2021 Portfolio BM	0.04	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.24</b>	--	--	--	--	--	--	
CT 529 Portfolio College (Fid Funds)	-0.10	--	--	--	--	--	1.10	2/2/2021
CT 529 Portfolio College Portfolio BM	0.04	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.14</b>	--	--	--	--	--	--	
CT 529 Portfolio Agrsv Gro (Fid Funds)	-1.54	--	--	--	--	--	8.80	2/2/2021
CT 529 Portfolio Agrsv Gro Portfolio BM	-1.25	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.29</b>	--	--	--	--	--	--	
CT 529 Portfolio Mod Growth (Fid Funds)	-0.93	--	--	--	--	--	6.10	2/2/2021
CT 529 Portfolio Mod Gro Portfolio BM	-0.79	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.14</b>	--	--	--	--	--	--	
CT 529 Portfolio Consvr (Fid Funds)	0.20	--	--	--	--	--	0.30	2/2/2021
CT 529 Portfolio Consvr Portfolio BM	0.21	--	--	--	--	--	--	
<i>Relative Return</i>	<b>-0.01</b>	--	--	--	--	--	--	

Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results. Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.** Performance shown is net of Program Fees and all underlying mutual fund fees.

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# CT 529 Index Age-Based and Static Portfolios

## Performance as of September 30, 2021

	Total Return %			Annualized				LOF*	Inception Date
	3M	YTD	1-Year	3-Year	5-Year	10-Year			
CT 529 Portfolio 2039 (Fid Index)	-1.47	--	--	--	--	--	7.40	2/2/2021	
CT 529 Portfolio 2039 Portfolio BM	-1.16	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.31</b>	--	--	--	--	--	--		
CT 529 Portfolio 2036 (Fid Index)	-1.21	--	--	--	--	--	6.40	2/2/2021	
CT 529 Portfolio 2036 Portfolio BM	-0.98	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.23</b>	--	--	--	--	--	--		
CT 529 Portfolio 2033 (Fid Index)	-0.94	--	--	--	--	--	5.30	2/2/2021	
CT 529 Portfolio 2033 Portfolio BM	-0.76	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.18</b>	--	--	--	--	--	--		
CT 529 Portfolio 2030 (Fid Index)	-0.67	--	--	--	--	--	4.30	2/2/2021	
CT 529 Portfolio 2030 Portfolio BM	-0.55	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.12</b>	--	--	--	--	--	--		
CT 529 Portfolio 2027 (Fid Index)	-0.48	--	--	--	--	--	3.20	2/2/2021	
CT 529 Portfolio 2027 Portfolio BM	-0.35	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.13</b>	--	--	--	--	--	--		
CT 529 Portfolio 2024 (Fid Index)	-0.20	--	--	--	--	--	2.20	2/2/2021	
CT 529 Portfolio 2024 Portfolio BM	-0.13	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.07</b>	--	--	--	--	--	--		
CT 529 Portfolio 2021 (Fid Index)	0.00	--	--	--	--	--	1.10	2/2/2021	
CT 529 Portfolio 2021 Portfolio BM	0.04	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.04</b>	--	--	--	--	--	--		
CT 529 Portfolio College (Fid Index)	-0.10	--	--	--	--	--	1.00	2/2/2021	
CT 529 Portfolio College Portfolio BM	0.04	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.14</b>	--	--	--	--	--	--		
CT 529 Portfolio Agrsv Gro (Fid Index)	-1.46	--	--	--	--	--	7.80	2/2/2021	
CT 529 Portfolio Agrsv Gro Portfolio BM	-1.25	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.21</b>	--	--	--	--	--	--		
CT 529 Portfolio Mod Growth (Fid Index)	-0.94	--	--	--	--	--	5.20	2/2/2021	
CT 529 Portfolio Mod Gro Portfolio BM	-0.79	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.15</b>	--	--	--	--	--	--		
CT 529 Portfolio Consvr (Fid Index)	0.20	--	--	--	--	--	-0.10	2/2/2021	
CT 529 Portfolio Consvr Portfolio BM	0.21	--	--	--	--	--	--		
<i>Relative Return</i>	<b>-0.01</b>	--	--	--	--	--	--		

Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results. Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.** Performance shown is net of Program Fees and all underlying mutual fund fees.

Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.fidelity.com](http://www.fidelity.com).**

# CT 529 Blend Age-Based Portfolios

## Performance as of September 30, 2021

	Total Return %				Annualized				LOF*	Inception Date
	3M	YTD	1-Year	3-Year	5-Year	10-Year				
CT 529 Portfolio 2039 (Fid Blend)	-1.37	--	--	--	--	--	--	7.90	2/2/2021	
CT 529 Portfolio 2039 Portfolio BM	-1.16	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.21</b>	--	--	--	--	--	--	--		
CT 529 Portfolio 2036 (Fid Blend)	-1.11	--	--	--	--	--	--	6.90	2/2/2021	
CT 529 Portfolio 2036 Portfolio BM	-0.98	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.13</b>	--	--	--	--	--	--	--		
CT 529 Portfolio 2033 (Fid Blend)	-0.94	--	--	--	--	--	--	5.60	2/2/2021	
CT 529 Portfolio 2033 Portfolio BM	-0.76	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.18</b>	--	--	--	--	--	--	--		
CT 529 Portfolio 2030 (Fid Blend)	-0.67	--	--	--	--	--	--	4.60	2/2/2021	
CT 529 Portfolio 2030 Portfolio BM	-0.55	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.12</b>	--	--	--	--	--	--	--		
CT 529 Portfolio 2027 (Fid Blend)	-0.48	--	--	--	--	--	--	3.40	2/2/2021	
CT 529 Portfolio 2027 Portfolio BM	-0.35	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.13</b>	--	--	--	--	--	--	--		
CT 529 Portfolio 2024 (Fid Blend)	-0.29	--	--	--	--	--	--	2.30	2/2/2021	
CT 529 Portfolio 2024 Portfolio BM	-0.13	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.16</b>	--	--	--	--	--	--	--		
CT 529 Portfolio 2021 (Fid Blend)	-0.10	--	--	--	--	--	--	1.30	2/2/2021	
CT 529 Portfolio 2021 Portfolio BM	0.04	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.14</b>	--	--	--	--	--	--	--		
CT 529 Portfolio College (Fid Blend)	0.00	--	--	--	--	--	--	1.30	2/2/2021	
CT 529 Portfolio College Portfolio BM	0.21	--	--	--	--	--	--	--		
<b>Relative Return</b>	<b>-0.21</b>	--	--	--	--	--	--	--		

Operations commenced February 2, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results. Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.** Performance shown is net of Program Fees and all underlying mutual fund fees.

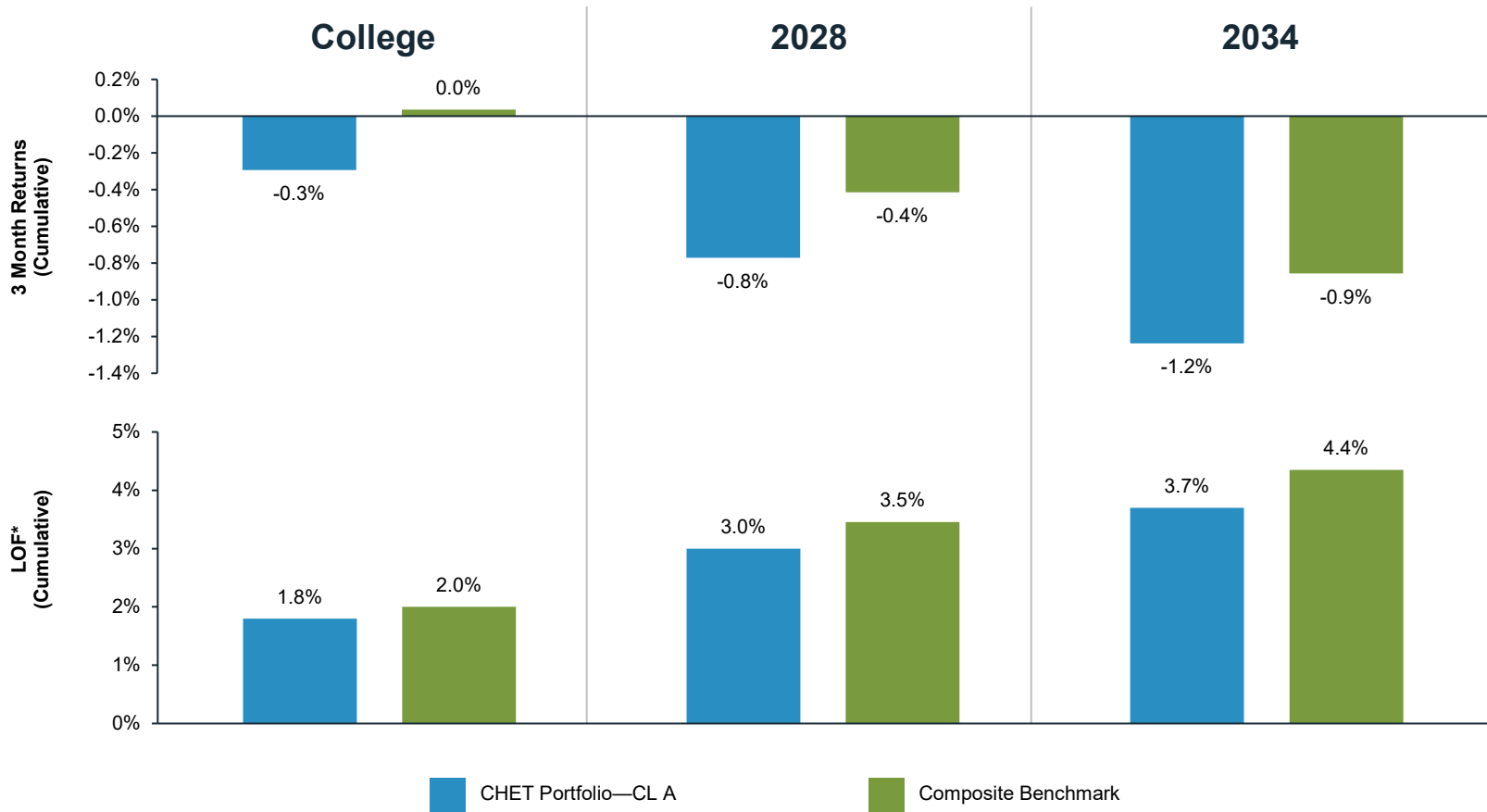
Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.fidelity.com](http://www.fidelity.com).**

# CHET Advisor 529 College Savings Program

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# CHET Advisor Age-Based Performance Summary

As of September 30, 2021



Operations commenced March 16, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

See performance pages for full standard performance net of sales charge.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

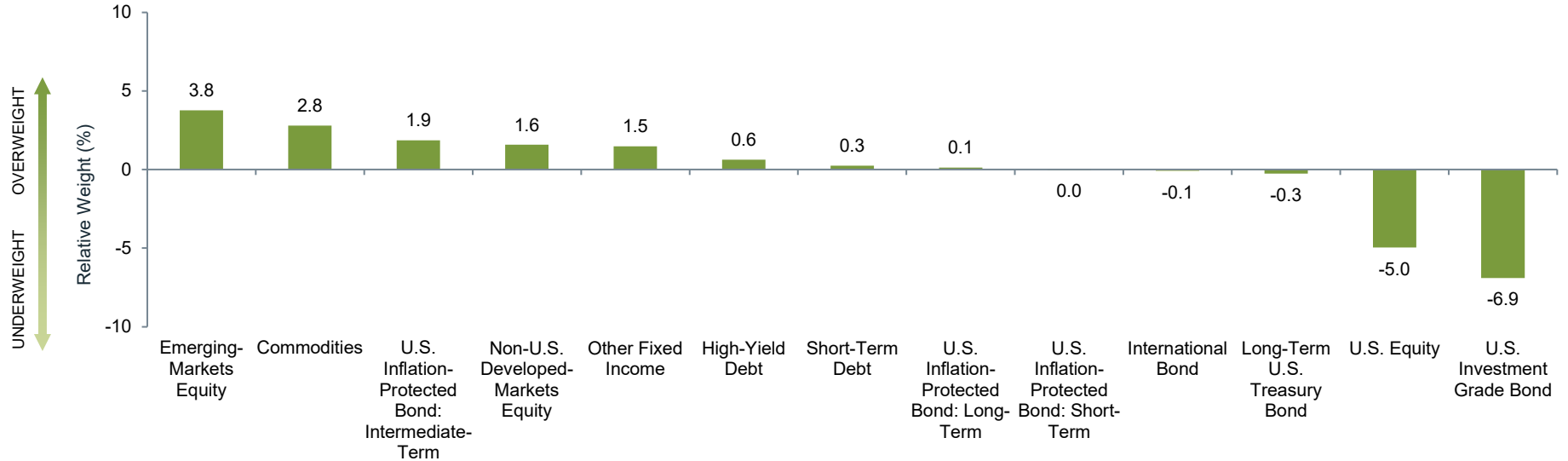
Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.institutional.fidelity.com](http://www.institutional.fidelity.com).**

# Current Positioning and Views

## CHET Advisor Portfolio 2028

### BENCHMARK RELATIVE ASSET CLASS EXPOSURE

AVERAGE EXPOSURE THROUGHOUT SEPTEMBER 2021



Equity markets are more fairly valued, although risks of near peak corporate profit margins have trended higher. We have an **overweight position in equities** relative to the composite benchmark.

**Within equities, positioning emphasizes emerging markets** based on attractive valuations, weak sentiment, and improving structural trends relative to developed market economies. We view EME as having a more favorable distribution of outcomes relative to US equities, which are starting from a higher valuation point.

**Inflation-sensitive assets are attractively valued** and sentiment is bearish following a long period of low inflation. Against the backdrop of accommodative monetary and fiscal policy, market participants may be mispricing the potential for inflation.

**Yields on sovereign bonds have increased from historic lows**, but the distribution of potential outcomes supports an underweight to sovereign bonds.

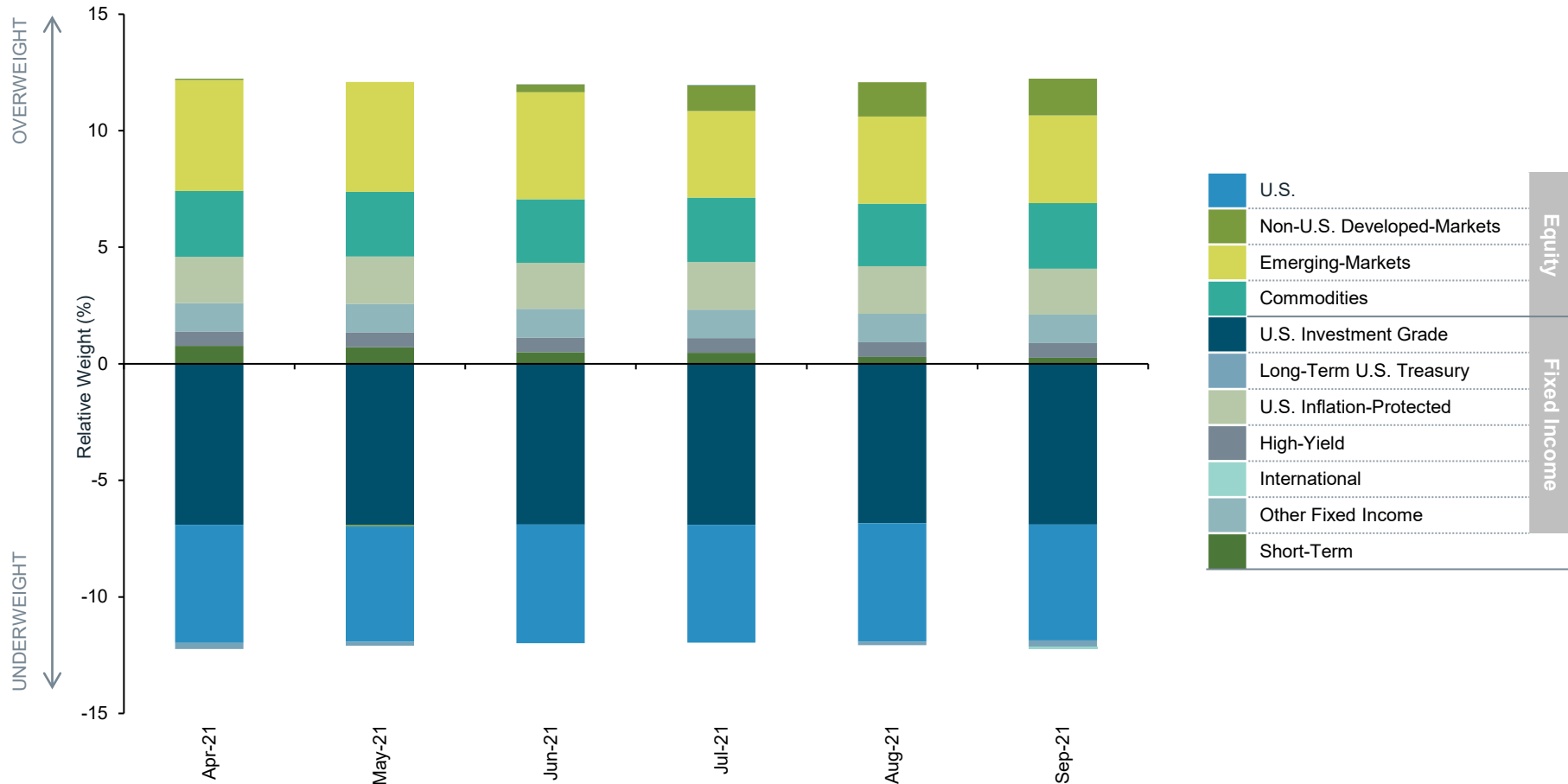
Active weights above reflect the difference between the average fund weights of an asset class less the average benchmark weight for each respective asset class during the month. Other Fixed Income includes Real Estate Debt, Floating Rate Debt, and Emerging Market Debt. LT Treasuries were previously classified under Investment Grade, but it became its own asset class as part of the most recent product update.

Source: Fidelity Investments, as of 9/30/21.

For illustrative purposes only.

# Benchmark Relative Asset Class Exposure

## CHET Advisor Portfolio 2028

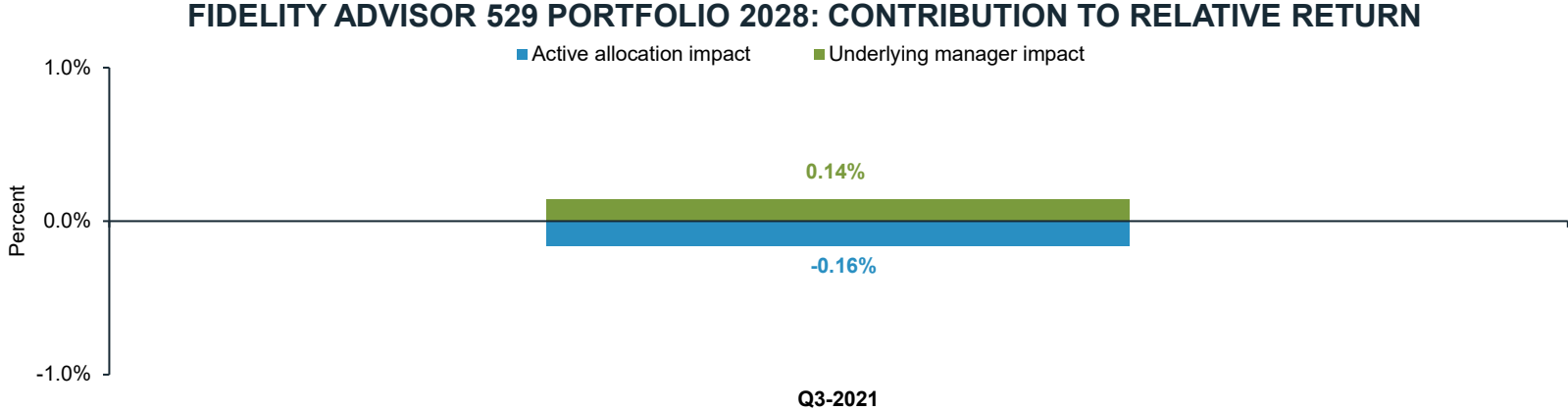


Benchmark Relative Asset Class Exposures above reflect the difference between the average fund weight less the average benchmark weight for each respective asset class for each one-month period. Other Fixed Income includes Real Estate Debt, Floating Rate Debt, International Debt, and Emerging Market Debt.

Source: Fidelity Investments, as of 9/30/21.

# Fidelity CHET Advisor 529 Portfolio 2028—Attribution

As of September 30, 2021



**HELPED**

- Allocation to Commodities
- Underlying Developed market Equities and Investment Grade Debt managers

**HURT**

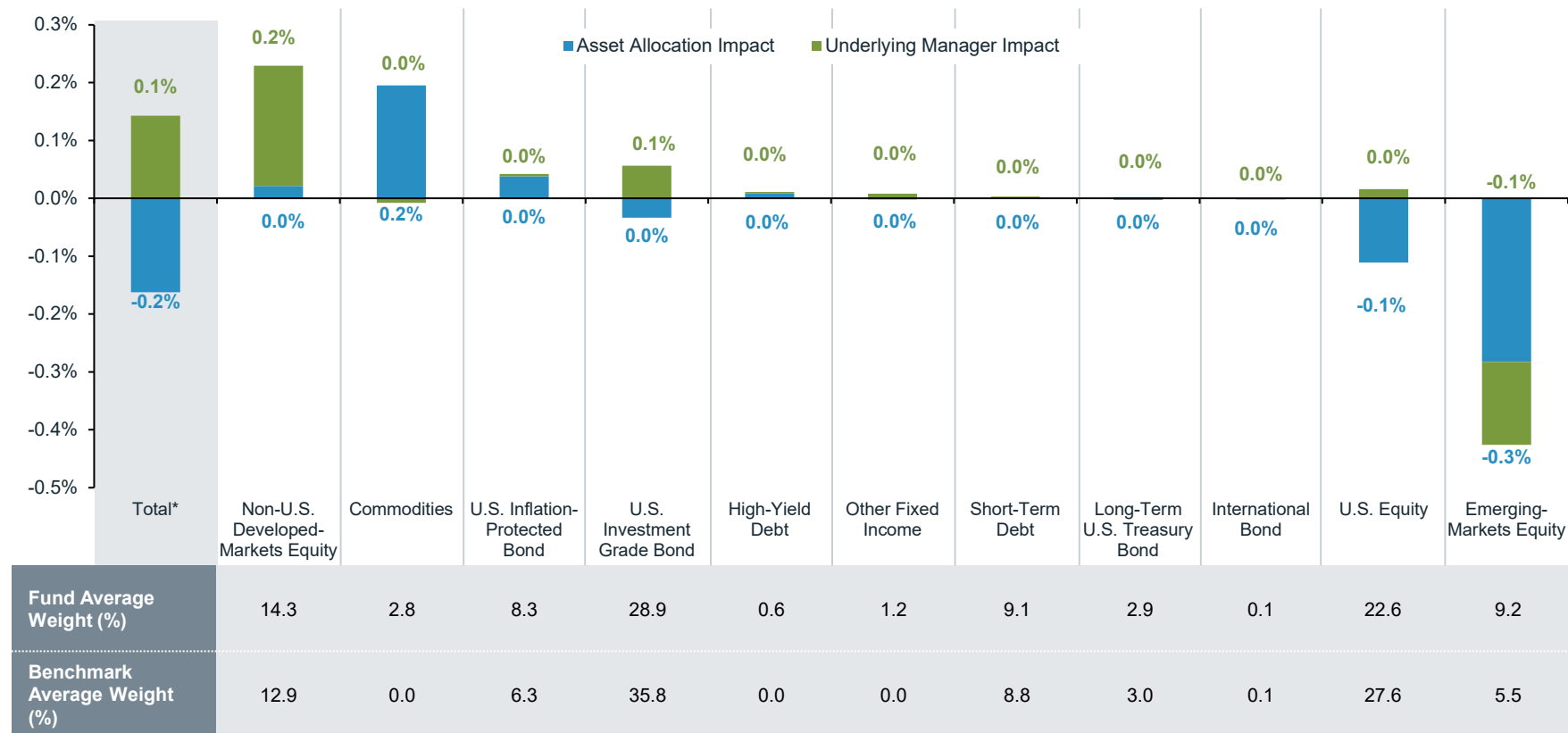
- Overweight to and underlying managers within Emerging Market Equities
  - Positioning within U.S. Equities



# CHET Advisor Portfolio 2028 Performance Attribution

## Three Months Ended September 30, 2021

### CONTRIBUTION TO RELATIVE RETURN BY ASSET CLASS



Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results. Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.** Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.institutional.fidelity.com](http://www.institutional.fidelity.com).** It is not possible to invest directly in an index. All market indices are unmanaged. Index performance is not meant to represent that of any Fidelity mutual fund. Total returns are historical and include change in share value and reinvestment of dividends and capital gains, if any. These figures do not include the effect of sales charges, if any. If sales charges were included, returns would have been lower. Accounting/timing adjustments are also excluded. The Advisor Portfolio 2028 example is shown as it had allocations to all underlying asset classes as of the stated reporting period and is not representative of the asset class allocation percentages of the other Advisor 529 Portfolios, which vary.

# Chet Advisor Portfolio Allocations

As of September 30, 2021

## BENCHMARK ALLOCATIONS<sup>1</sup>

	2039	2037	2034	2031	2028	2025	2022	College	Agrsv Growth	Mod Growth
U.S. Equity	56.2%	50.9%	42.8%	34.7%	26.7%	19.0%	10.9%	8.7%	59.7%	41.4%
Non-U.S. Equity	38.0%	34.4%	28.9%	23.5%	18.1%	12.9%	7.4%	5.9%	40.3%	28.0%
U.S. Investment Grade Bond	2.5%	11.3%	24.4%	30.3%	36.3%	41.3%	37.9%	36.6%	0.0%	24.1%
Long-Term U.S. Treasury Bond	3.2%	3.2%	3.2%	3.1%	3.1%	3.0%	2.9%	2.9%	0.0%	3.1%
U.S. Inflation-Protected Bond: Short-Term	0.0%	0.0%	0.0%	0.2%	0.8%	1.5%	2.3%	2.5%	0.0%	0.0%
U.S. Inflation-Protected Bond: Intermediate-Term	0.0%	0.0%	0.4%	3.8%	5.6%	7.4%	9.1%	9.1%	0.0%	2.8%
U.S. Inflation-Protected Bond: Long-Term	0.0%	0.0%	0.1%	0.7%	0.5%	0.1%	0.0%	0.0%	0.0%	0.3%
International Bond	0.0%	0.1%	0.3%	0.3%	0.4%	0.5%	0.5%	0.5%	0.0%	0.3%
Short-Term Debt	0.0%	0.0%	0.0%	3.4%	8.5%	14.3%	29.0%	33.9%	0.0%	0.0%

## ACTUAL ALLOCATIONS

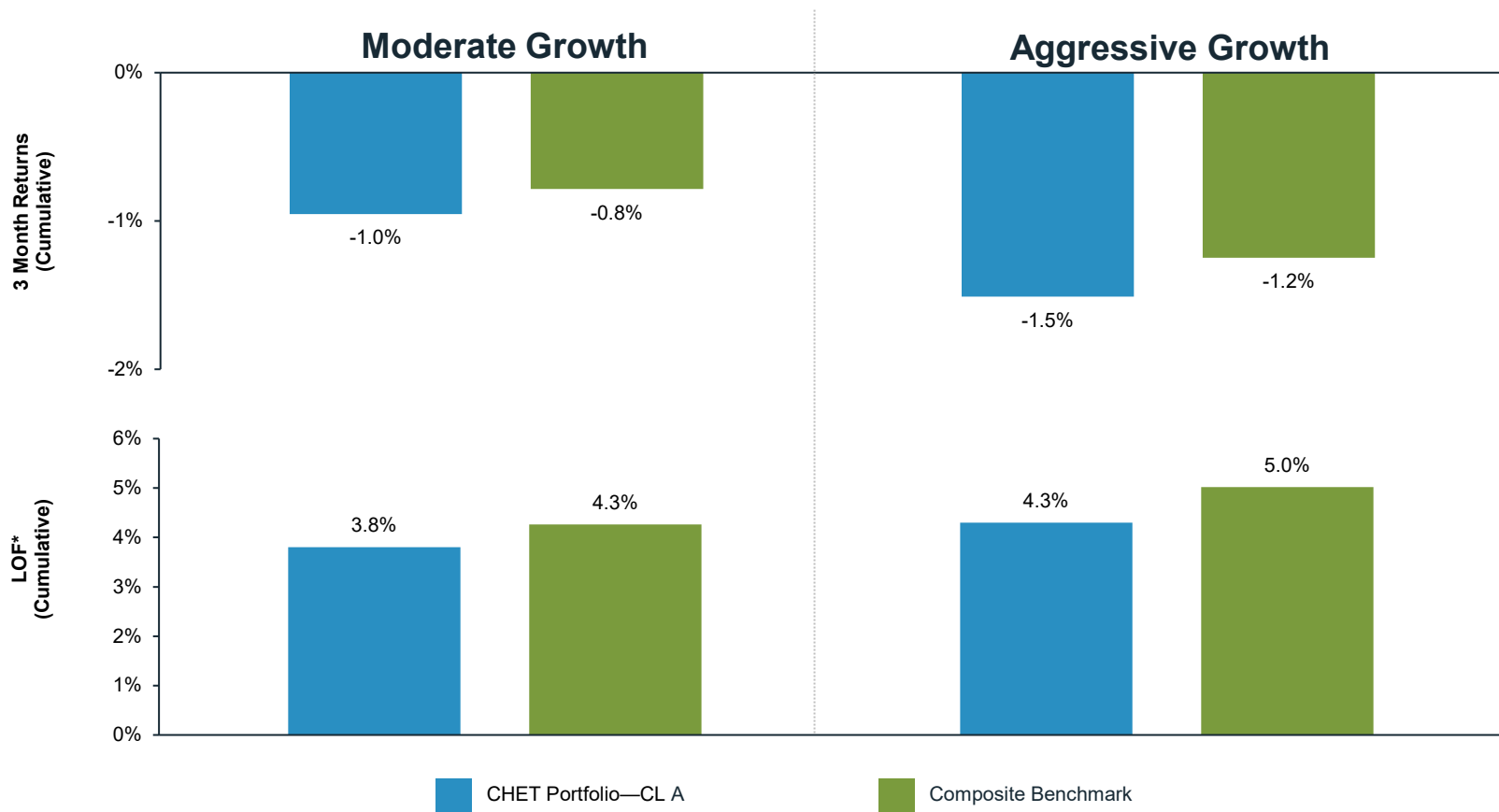
	2039	2037	2034	2031	2028	2025	2022	College	Agrsv Growth	Mod Growth
<i>Composite Benchmark Asset Classes</i>										
U.S. Equity	51.4%	46.1%	37.9%	29.9%	21.9%	14.2%	6.1%	3.9%	55.9%	37.6%
Non-U.S. Equity	42.6%	39.5%	34.0%	28.6%	23.2%	18.0%	12.5%	11.0%	42.8%	30.5%
<i>Developed-Markets Equity</i>	27.7%	25.6%	21.8%	18.0%	14.2%	10.5%	6.7%	5.6%	29.3%	20.6%
<i>Emerging-Markets Equity</i>	14.9%	13.9%	12.2%	10.6%	9.0%	7.5%	5.9%	5.4%	13.5%	9.8%
U.S. Investment Grade Bond	0.0%	4.3%	17.4%	23.2%	29.3%	34.3%	30.9%	29.7%	0.0%	19.2%
Long-Term U.S. Treasury Bond	2.8%	2.9%	2.9%	2.8%	2.8%	2.7%	2.7%	2.7%	0.0%	3.1%
U.S. Inflation-Protected Bond: Short-Term	0.0%	0.0%	0.0%	0.2%	0.8%	1.6%	3.0%	3.3%	0.0%	0.0%
U.S. Inflation-Protected Bond: Intermediate-Term	0.4%	2.1%	2.4%	5.5%	7.3%	9.2%	10.4%	10.3%	0.0%	5.6%
U.S. Inflation-Protected Bond: Long-Term	0.0%	0.0%	0.1%	1.0%	0.8%	0.2%	0.0%	0.0%	0.0%	0.4%
International Bond	0.0%	0.0%	0.2%	0.2%	0.3%	0.4%	0.4%	0.4%	0.0%	0.2%
Short-Term Debt	-0.1%	0.2%	0.2%	3.7%	8.8%	14.6%	29.2%	34.1%	-0.1%	-0.1%
<b>Total</b>	<b>97.1%</b>	<b>95.1%</b>	<b>95.1%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>95.2%</b>	<b>98.6%</b>	<b>96.5%</b>
<i>Out-of-Composite Benchmark Asset Classes</i>										
Commodities	2.8%	3.0%	3.0%	3.0%	2.9%	2.9%	2.9%	2.9%	1.4%	1.4%
High-Yield Debt	0.1%	0.7%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.0%	0.8%
Floating-Rate Debt	0.0%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.1%	0.0%	0.2%
Emerging-Markets Debt	0.1%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.7%	0.0%	0.7%
Real Estate Debt	0.0%	0.4%	0.4%	0.4%	0.4%	0.4%	0.4%	0.4%	0.0%	0.5%
<b>Total</b>	<b>2.9%</b>	<b>4.9%</b>	<b>4.9%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>4.8%</b>	<b>1.4%</b>	<b>3.5%</b>

<sup>1</sup> Benchmark allocations and actual allocations are as of 9/30/21.

Source: Fidelity Investments. The Adviser may use an active asset allocation strategy to increase or decrease neutral asset class exposures reflected above by up to 10 percentage points for Equity Funds (includes domestic and international equity funds), Bond Funds and Short Term Funds to reflect the Adviser's market outlook, which is primarily focused on the intermediate term. The Adviser may also make active asset allocations within other asset classes (including Commodities, High Yield Debt, Floating Rate Debt, Real Estate Debt, Inflation-Protected Debt, and Emerging Markets Debt) from 0% to 10% individually but no more than 25% in aggregate within those other asset classes. Such asset classes are not reflected in the neutral allocations reflected in the target allocation table above. This strategy may not be successful in adding value, may increase losses to the Fund and/or cause the Fund to have a risk profile different than that portrayed above from time to time.

# CHET Advisor Active Static Performance Summary

As of September 30, 2021



Operations commenced March 16, 2021.

\*LOF Cumulative if fund has less than 1-year of track record.

Source: FMRCo. **The performance data featured represents past performance, which is no guarantee of future results. Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.** Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.institutional.fidelity.com](http://www.institutional.fidelity.com).**

# CHET Advisor 529 Plan Active Age-Based Portfolios

## Performance as of September 30, 2021

	Total Return %				Annualized			LOF**	Inception Date
	3M	YTD	1-Year	3-Year	5-Year	10-Year			
CHET Advisor 2039 – A (NAV)	-0.29	--	--	--	--	--	1.80	3/16/2021	
CHET Advisor 2039 – A (POP)	-3.78	--	--	--	--	--	-1.76		
529 Port 2039 Comp Idx	0.04	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.33</b>	--	--	--	--	--	--		
CHET Advisor 2037 – A (NAV)	-0.20	--	--	--	--	--	2.20	3/16/2021	
CHET Advisor 2037 – A (POP)	-3.69	--	--	--	--	--	-1.38		
529 Port 2037 Comp Idx	0.00	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.20</b>	--	--	--	--	--	--		
CHET Advisor 2034 – A (NAV)	-0.48	--	--	--	--	--	2.60	3/16/2021	
CHET Advisor 2034 – A (POP)	-3.97	--	--	--	--	--	-0.99		
529 Port 2034 Comp Idx	-0.21	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.27</b>	--	--	--	--	--	--		
CHET Advisor 2031 – A (NAV)	-0.77	--	--	--	--	--	3.00	3/16/2021	
CHET Advisor 2031 – A (POP)	-4.24	--	--	--	--	--	-0.60		
529 Port 2031 Comp Idx	-0.41	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.36</b>	--	--	--	--	--	--		
CHET Advisor 2028 – A (NAV)	-0.96	--	--	--	--	--	3.40	3/16/2021	
CHET Advisor 2028 – A (POP)	-4.42	--	--	--	--	--	-0.22		
529 Port 2028 Comp Idx	-0.62	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.34</b>	--	--	--	--	--	--		
CHET Advisor 2025 – A (NAV)	-1.24	--	--	--	--	--	3.70	3/16/2021	
CHET Advisor 2025 – A (POP)	-4.69	--	--	--	--	--	0.07		
529 Port 2025 Comp Idx	-0.86	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.38</b>	--	--	--	--	--	--		
CHET Advisor 2022 – A (NAV)	-1.33	--	--	--	--	--	4.20	3/16/2021	
CHET Advisor 2022 – A (POP)	-4.78	--	--	--	--	--	0.55		
529 Port 2022 Comp Idx	-1.04	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.29</b>	--	--	--	--	--	--		
CHET Advisor College – A (NAV)	-1.61	--	--	--	--	--	4.20	3/16/2021	
CHET Advisor College – A (POP)	-5.05	--	--	--	--	--	0.55		
529 College Portfolio BM	-1.16	--	--	--	--	--	--		
<b>Relative Return*</b>	<b>-0.45</b>	--	--	--	--	--	--		

Operations commenced March 16, 2021.

\*Returns relative to NAV performance.

\*\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

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# CHET Advisor 529 Plan Active Age-Based Portfolios

## Performance as of September 30, 2021

	Total Return %			Annualized			LOF**	Inception Date
	3M	YTD	1-Year	3-Year	5-Year	10-Year		
CHET Advisor Aggr Growth – A (NAV)	-1.51	--	--	--	--	--	4.30	3/16/2021
CHET Advisor Aggr Growth – A (POP)	-4.96	--	--	--	--	--	0.65	
Aggr Growth Portfolio BM	-1.25	--	--	--	--	--	--	
<b>Relative Return*</b>	<b>-0.26</b>	--	--	--	--	--	--	
CHET Advisor Moderate Growth – A (NAV)	-0.95	--	--	--	--	--	3.80	3/16/2021
CHET Advisor Moderate Growth – A (POP)	-4.42	--	--	--	--	--	0.17	
Mod Growth Portfolio BM	-0.79	--	--	--	--	--	--	
<b>Relative Return*</b>	<b>-0.16</b>	--	--	--	--	--	--	

Operations commenced March 16, 2021.

\*Returns relative to NAV performance.

\*\*LOF Cumulative if fund has less than 1-year of track record.

Source: Fidelity Investments. **The performance data featured represents past performance, which is no guarantee of future results.**

**Investment return and principal value of an investment will fluctuate; therefore, you may have a gain or loss when you sell your units.**

Performance shown is net of Program Fees and all underlying mutual fund fees. Returns are historical and include change in unit value and reinvestment of dividends and capital gains, if any. **Current performance may be higher or lower than the performance data quoted. To learn more or to obtain the most recent month-end performance, contact Fidelity or visit [www.institutional.fidelity.com](http://www.institutional.fidelity.com).**

# Important Additional Information

Performance data shown represents past performance and is no guarantee of future results. Investment return and principal value will fluctuate, so you may have a gain or loss when units are sold.

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**Please carefully consider the plan's investment objectives, risks, charges and expenses before investing. For this and other information on any 529 College Savings Plan managed by Fidelity, contact Fidelity for a free Fact Kit, or view one online. Read it carefully before you invest or send money.**

**The Connecticut Higher Education Trust (CHET) 529 College Savings Plan - Direct Plan is offered by the Treasurer of the state of Connecticut and managed by Fidelity Investments. If you or the designated beneficiary is not a Connecticut resident, you may want to consider, before investing, whether your state or the beneficiary's home state offers its residents a plan with alternate state tax advantages or other state benefits such as financial aid, scholarship funds and protection from creditors.**

**The CHET Advisor 529 is offered by the State of Connecticut and managed by Fidelity Investments. If you or the designated beneficiary is not a Connecticut resident, you may want to consider, before investing, whether your state or the beneficiary's home state offers its residents a plan with alternate state tax advantages or other benefits.**

**Units of the Portfolios are municipal securities and may be subject to market volatility and fluctuation.**

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# *CHET Advisory Committee*

## **529 Landscape Overview**

December 10, 2021

# Today's Discussion

	<u>Slide</u>
• The Market Today	3
• Trends and Developments	10
• Morningstar Rating Overview	14

## Appendix

2021 Morningstar Ratings

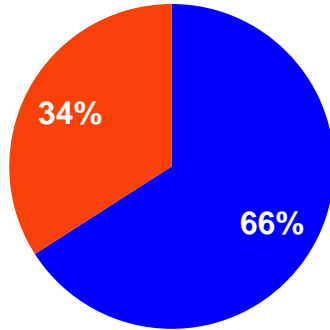
AKF Consulting Group Overview

# Section 1.

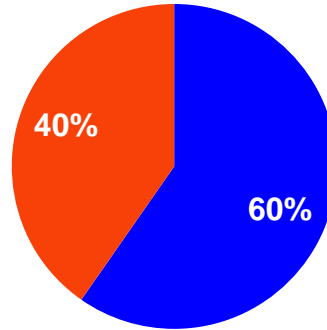
## The Market Today

# The 529 Savings Market Today

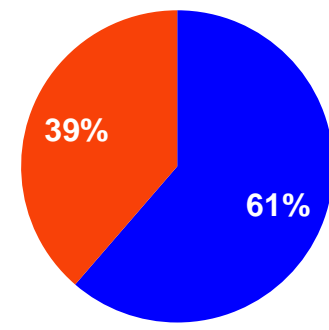
Plan Types



Assets



Accounts

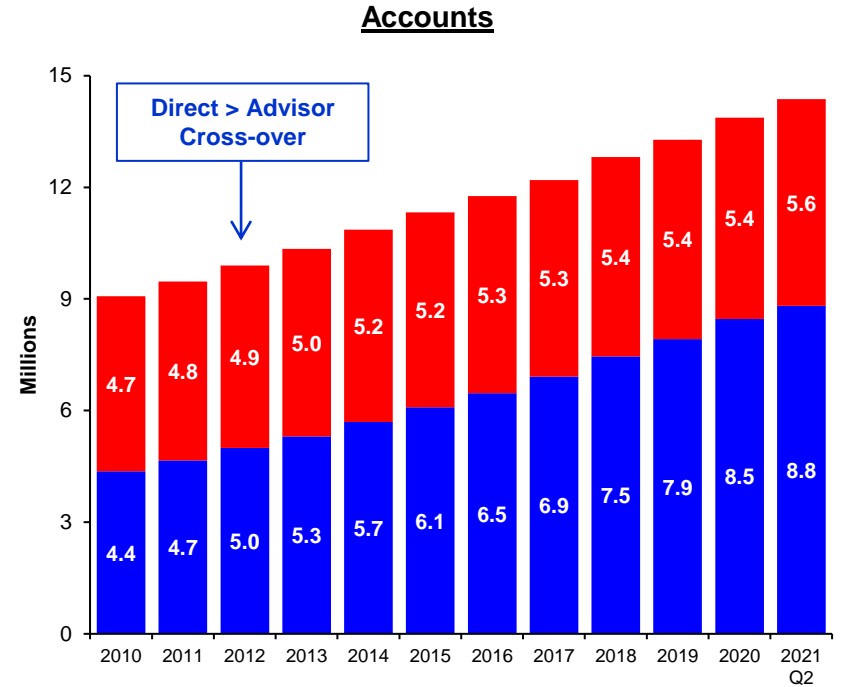
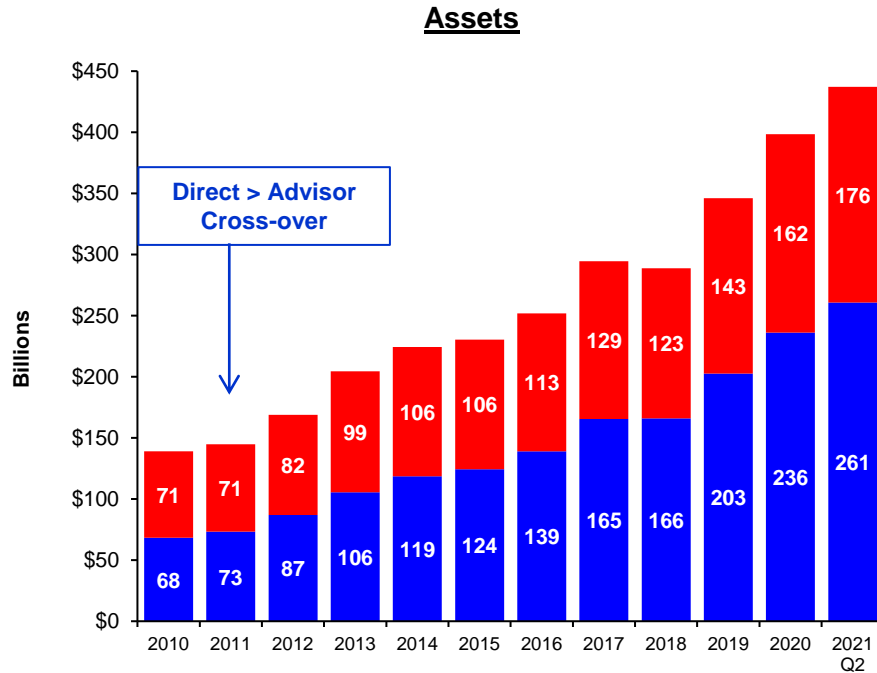


		Direct <sup>1</sup>	Advisor	Total
Plans		61	31	92
Assets		\$260,895,584,728	\$176,213,513,183	\$437,109,097,910
Accounts		8,814,211	5,554,615	14,368,826
Average Account Size	National	\$29,599	\$31,724	\$30,421
	<i>CHET</i>	<i>\$30,223</i>	<i>\$28,901</i>	<i>\$29,987</i>

Source: College Savings Plans Network ("CSPN") as of June 30, 2021

<sup>1</sup> Includes Louisiana K-12 Plan

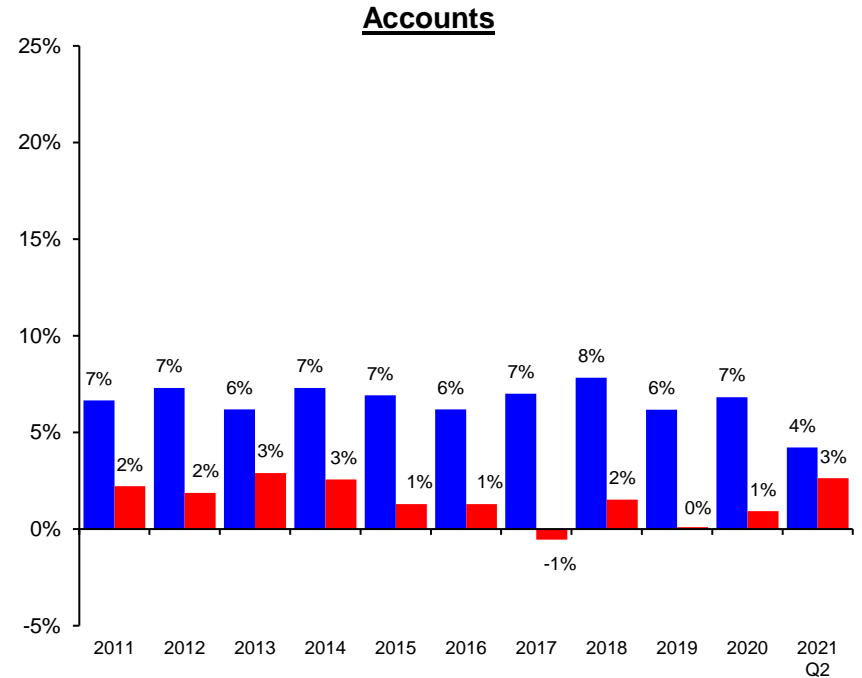
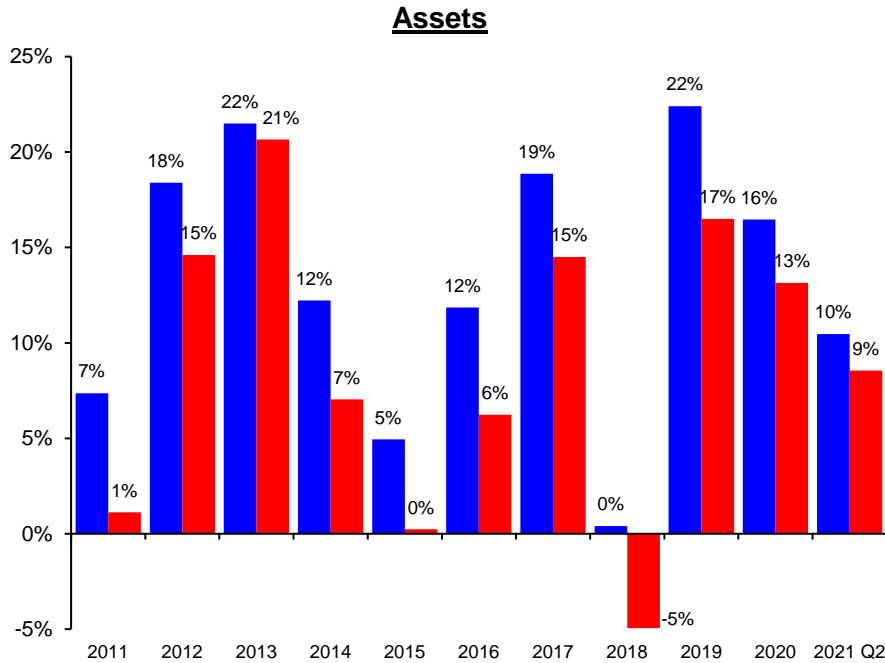
# Direct and Advisor Plan Growth



Average Annual Increase 2010 – 2021 Q2	Direct	Advisor
Assets	\$18.3B	\$10.0B
Accounts	424K	81K

Source: CSPN as of June 30, 2021

# Direct and Advisor Growth Rates



Average Annual Growth 2011 – 2021 Q2	Direct	Advisor
<b>Assets</b>	<b>13.6%</b>	<b>9.1%</b>
<b>Accounts</b>	<b>6.9%</b>	<b>1.6%</b>

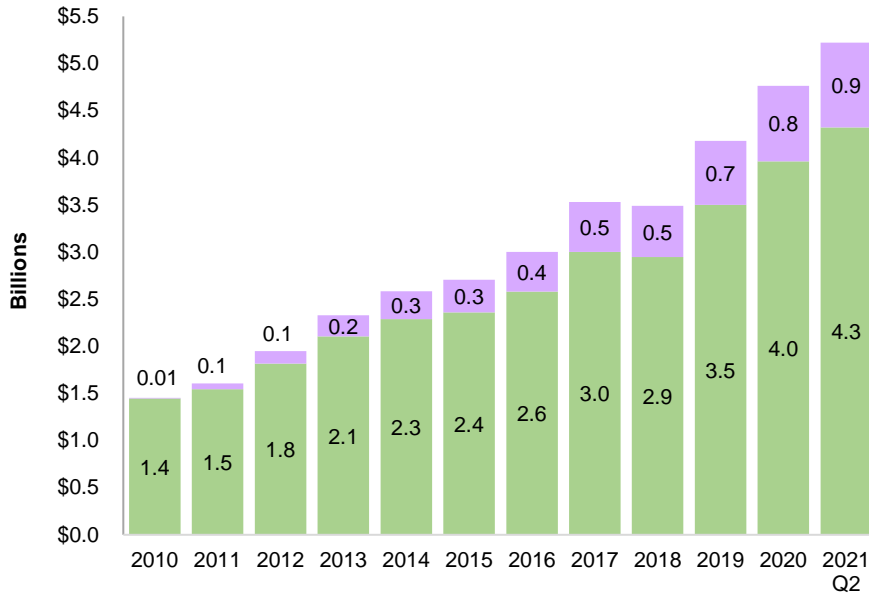
Source: CSPN as of June 30, 2021

Percentage labels in bar graphs represent growth rates for the January 1 to December 31 period of each year

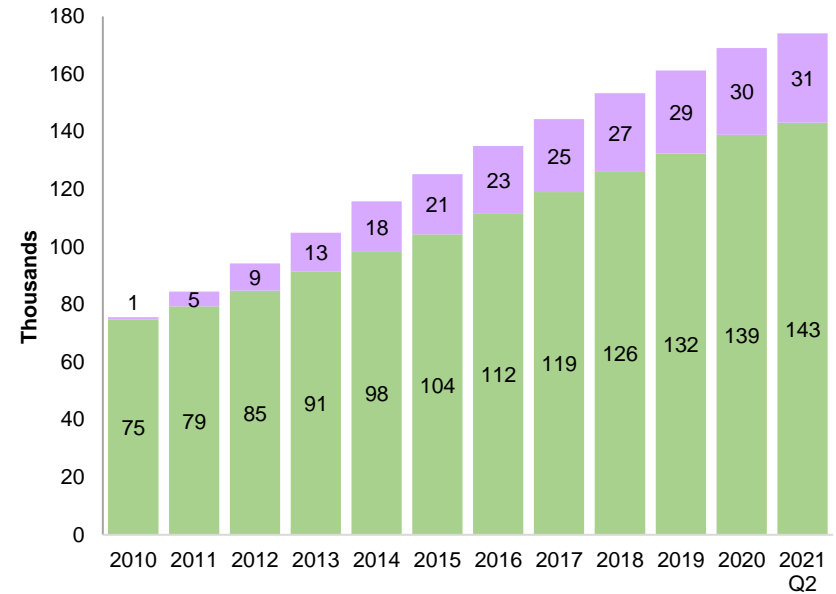


# Connecticut 529 Savings Overview

**Assets**



**Accounts**

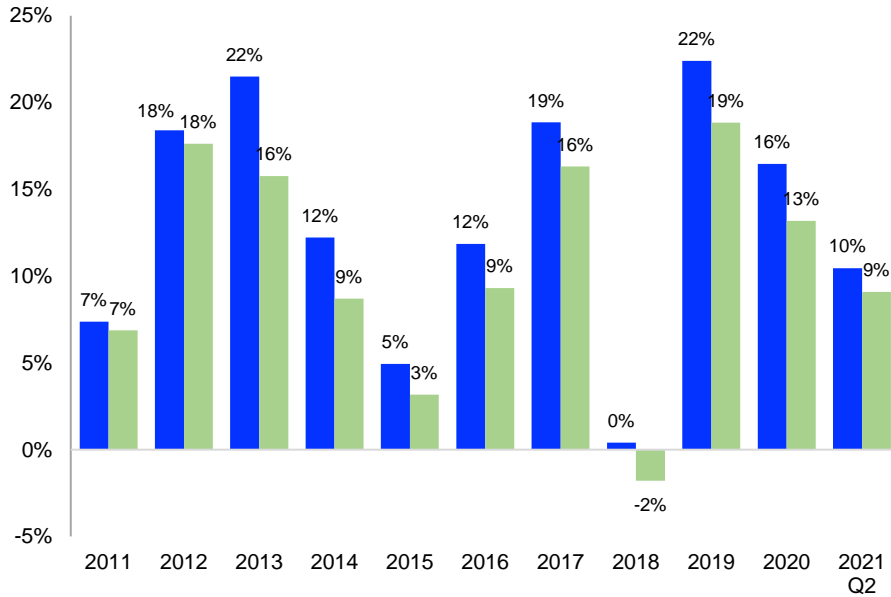


Average Annual Increase 2010 – 2021 Q2	CHET Direct	CHET Advisor
Assets	\$274K	\$85K
Accounts	6.5K	2.9K

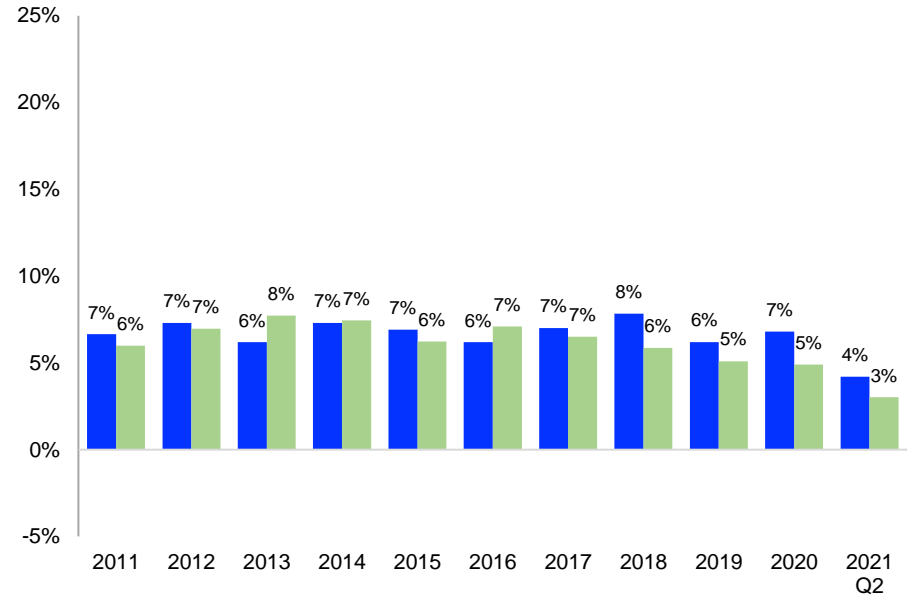
Source: CSPN as of June 30, 2021

# Direct Plans – Relative Growth

**Assets**



**Accounts**



Average Annual Growth 2011 – 2021 Q2	National Direct	CHET Direct
Assets	13.6%	11.0%
Accounts	6.9%	6.4%

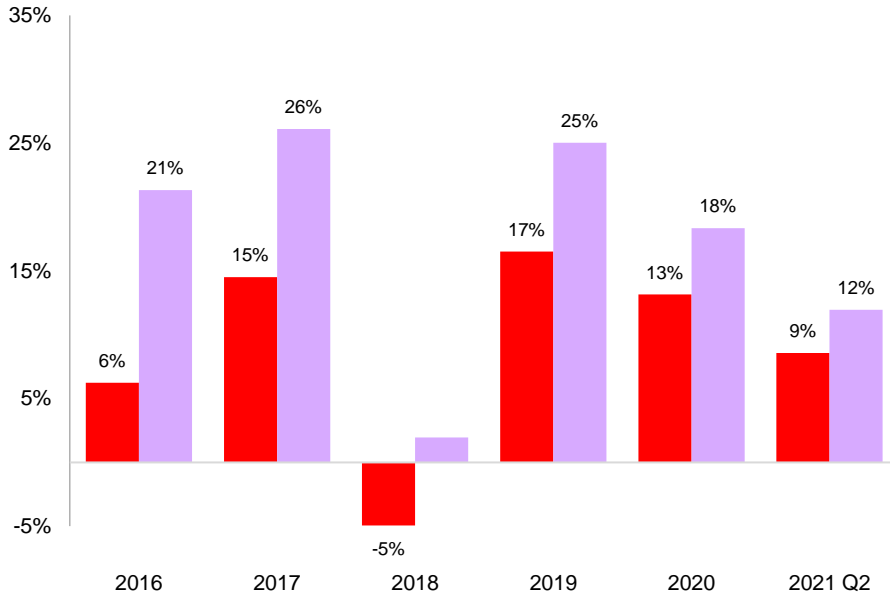
Source: CSPN as of June 30, 2021

Percentage labels in bar graphs represent growth rates for the January 1 to December 31 period of each year

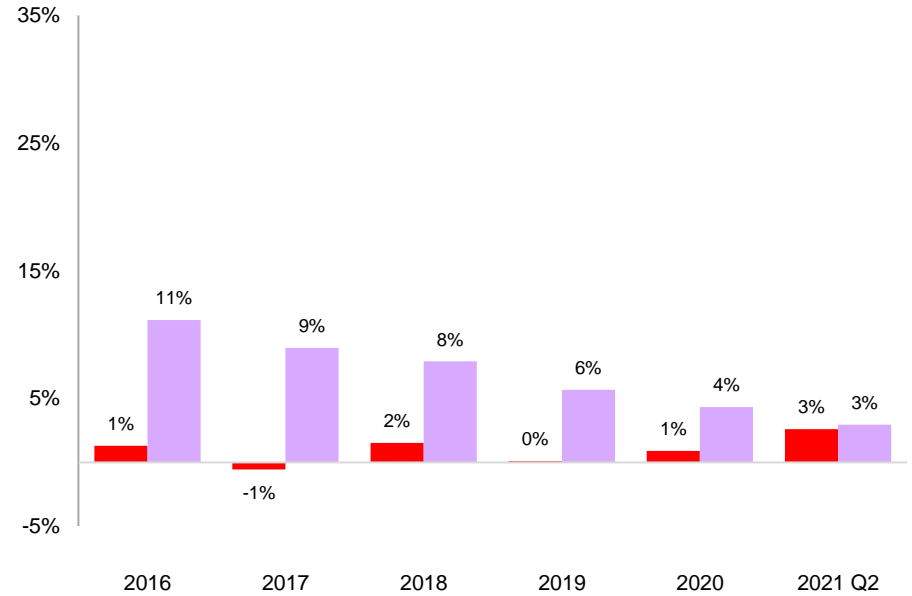


# Advisor Plans – Relative Growth

**Assets**



**Accounts**



Average Annual Growth 2016 – 2021 Q2	National Advisor	CHET Advisor
<b>Assets</b>	<b>11.1%</b>	<b>18.84%</b>
<b>Accounts</b>	<b>1.8%</b>	<b>7.4%</b>

Source: CSPN as of June 30, 2021

Percentage labels in bar graphs represent growth rates for the January 1 to December 31 period of each year



# Section 2.

## Trends and Developments

# Registration of 529-Specific Tickers

- Some Managers of Advisor Plans have used individualized tickers over the years, often through dedicated share classes, including primarily:
  - American Funds (Virginia Advisor - 2002)
  - MFS Investments (Oregon Advisor - 2002)
  - *Fidelity (New Hampshire Advisor - 2014)*
- As of 2020, Nasdaq Fund Network (“NFN”) increased its efforts to register 529 Plans, including Plans managed by:
  - BlackRock (Ohio Advisor - 2020)
  - *Fidelity (Oklahoma Advisor - 2020 and Connecticut Advisor - 2021)*
  - Franklin Templeton (New Jersey Advisor - 2021)
  - John Hancock (Alaska Advisor - 2021)
  - Nuveen (Colorado Advisor - 2021)
  - Voya (Wisconsin Advisor - 2021)
- Effective July 2021, Utah’s my529 became the first and only Direct Plan to participate

Source: Data provided by Nasdaq Fund Network as of October 11, 2021

See <https://www.nasdaq.com/solutions/nasdaq-fund-network-529s> for more information

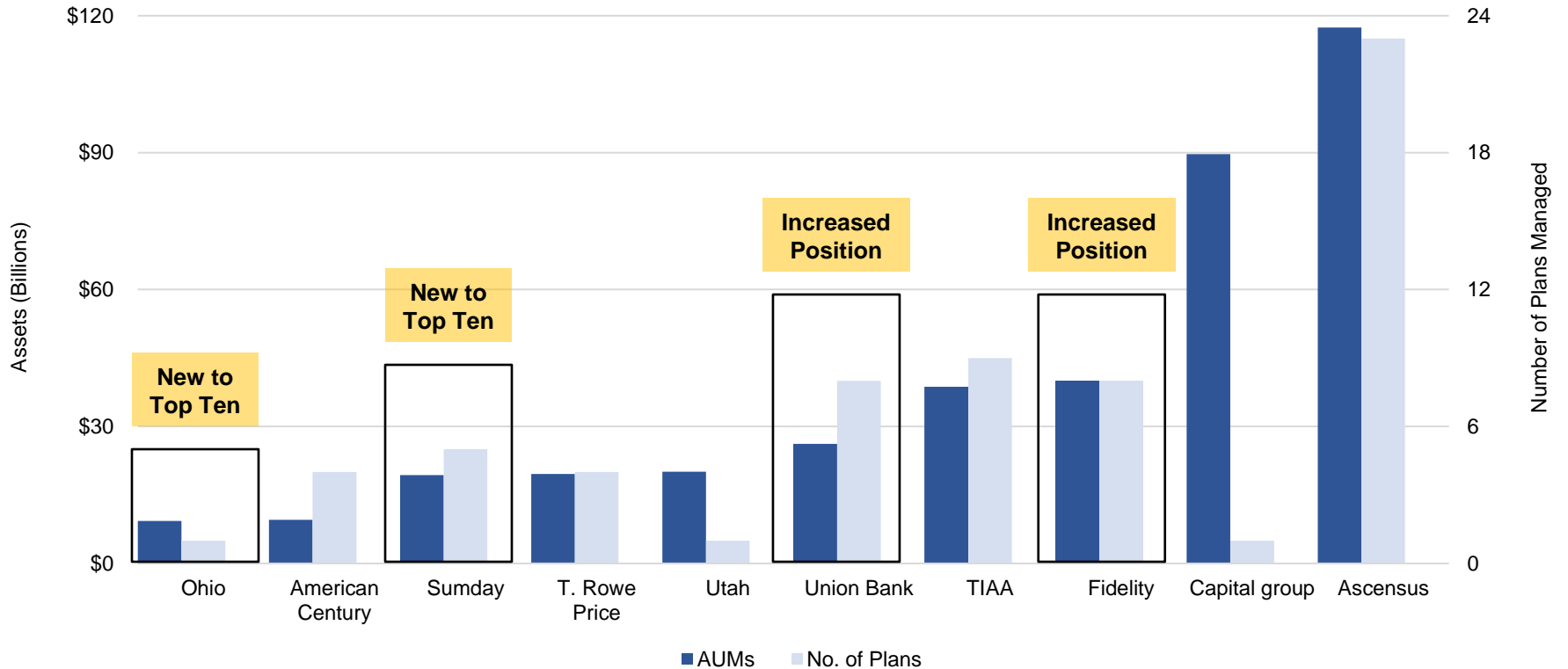
# Advisor Plan Omnibus Recordkeeping

	Edward Jones	Merrill	Raymond James	Ameriprise	Morgan Stanley	Fidelity	Pershing	Wells Fargo	Total Dealers
American Funds	X	X	X	X	X	X	X	X	8
Hancock	X		X	X			X	X	5
Voya	X	X	X	X			X		5
BlackRock	X	X	X	X		X			5
Columbia	X	X	X	X					4
TIAA (Nuveen)	X	X		X	X				4
Invesco	X	X	X			X			4
Fidelity			X (NH / OK)	X (NH)		X (NH)			3
Franklin Templeton	X		X	X					3
MFS	X	X							2
Hartford	X (WV)								1
Merrill Lynch		X							1
Morgan Stanley					X				1
Union Bank					X				1
<b>Total Plans</b>	<b>10</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>2</b>	

Source: ISS Market Intelligence as of November 29, 2021

# Program Manager Concentration

- Top Ten Managers Account for 89% of Assets Under Management



Source: CSPN data as of June 30, 2021

Ascensus data includes Advisor Plans in Indiana, New York and Rhode Island

The chart reflects expected Program Manager conversion from MFS to Sunday in Oregon (2022 Q2)

## Section 3.

# Morningstar Rating Overview

# Morningstar Rating Methodology as of 2020

- Pillar ratings are based on a Five-Point scale:<sup>1</sup>

5	4	3	2	1
High	Above Average	Average	Below Average	Low

- Plan Score is based upon Pillar ratings and the following Pillar weightings:

Process	People	Parent	Price
30%	30%	10%	30%

- Plan ratings are based on the following thresholds:

Plan Rating		Plan Score Threshold
Medals	Gold	$\geq 4.5$
	Silver	$= 4.0$ to $< 4.5$
	Bronze	$= 3.5$ to $< 4.0$
Neutral		$= 2.5$ to $< 3.5$
Negative		$< 2.5$

Source: Morningstar as of July 20, 2020

<sup>1</sup> Numeric values for Price Pillar are reversed (i.e., 5 = Low, 4 = Below Average, etc.)

# Connecticut Ratings Overview

- CHET Direct has consistently received a Bronze Plan rating since 2012
- CHET Advisor is newly rated in 2021 with a Neutral Plan rating

	CHET Direct			CHET Advisor	
	2012-2019 - TIAA	2020 - TIAA	2021 - Fidelity	2020 - Hartford	2021 - Fidelity
Process	Neutral	Average	Above Average ↑	<i>Not rated</i>	Above Average
People	Positive	Average ↓	Above Average ↑	<i>Not rated</i>	Above Average
Parent	Neutral	Average	Average	<i>Not rated</i>	Average
Price	Positive	Below Average	Average ↓	<i>Not rated</i>	High
Overall Plan Rating	Bronze	Bronze	Bronze	<i>Not rated</i>	Neutral

Process, People and Parent	High	Above Average	Average	Below Average	Low
Price	Low	Below Average		Above Average	High

Source: Morningstar as of October 26, 2021

↑ Pillar Upgrade    ↓ Pillar Downgrade

# CHET Direct 2021 Pillar Ratings

- Calculated Plan Score (3.6) is consistent with a Bronze rating (3.5 to 3.9 range)
- A single Pillar downgrade would jeopardize the Bronze rating
- Multiple Pillar upgrades would be required to move Plan to Silver

	Pillar Rating	Numeric Value	Pillar Weight	Plan Score
Process	Above Average	4	30%	1.2
People	Above Average	4	30%	1.2
Parent	Average	3	10%	0.3
Price	Average	3	30%	0.9
Overall Plan Rating	Bronze		100%	3.6

Process, People and Parent	High	Above Average	Average	Below Average	Low
Price	Low	Below Average		Above Average	High

Source: Morningstar as of October 26, 2021

# Fidelity-managed Direct Plan 2021 Ratings

- Each Fidelity-managed Direct Plan earns a Bronze rating
  - Scores vary, however, within the Bronze range
- Identical Process, People and Price Pillar ratings (each weighted 30%)
- Parent Pillar ratings vary widely (10% weight)

	AZ	CT	DE	MA	NH
Process	Above Average	Above Average	Above Average	Above Average	Above Average
People	Above Average	Above Average	Above Average	Above Average	Above Average
Parent	Average	Average	Above Average	High	Below Average
Price	Average	Average	Average	Average	Average
Bronze – Score	3.6	3.6	3.7	3.8	3.5

Process, People and Parent	High	Above Average	Average	Below Average	Low
Price	Low	Below Average		Above Average	High

Source: Morningstar as of October 26, 2021

# CHET Advisor 2021 Pillar Ratings

- Calculated Plan Score (3.0) is consistent with a Neutral rating (2.5 to 3.4 range)
- CHET Advisor’s “High” Price Pillar rating reflects a general downward trend across Advisor Plans
- Upgrade in multiple Pillars would be required to move Plan to Bronze

	Pillar Rating	Numeric Value	Pillar Weight	Plan Score
Process	Above Average	4	30%	1.2
People	Above Average	4	30%	1.2
Parent	Average	3	10%	0.3
Price	High	1	30%	0.3
Overall Plan Rating	Neutral		100%	3.0

Process, People and Parent	High	Above Average	Average	Below Average	Low
Price	Low	Below Average		Above Average	High

Source: Morningstar as of October 26, 2021

# Fidelity-managed Advisor Plan 2021 Ratings

- Two Fidelity-managed Advisor Plans are rated Neutral
- Identical Process, People and Price Pillar ratings (each weighted 30%)
- Parent Pillar ratings differ and drive score differential (10% weight)

	CT	NH	OK
Process	Above Average	Above Average	<i>Not rated</i>
People	Above Average	Above Average	<i>Not rated</i>
Parent	Average	Below Average	<i>Not rated</i>
Price	High	High	<i>Not rated</i>
Neutral - Score	3.0	2.9	<i>Not rated</i>

Process, People and Parent	High	Above Average	Average	Below Average	Low
Price	Low	Below Average		Above Average	High

Source: Morningstar as of October 26, 2021

# Appendix 1

## 2021 Morningstar Ratings

# Morningstar 2021 Ratings – Changes from 2020

	Program	Plan Type	Rating Change
<b>Gold</b> 3 Direct Plans	Illinois – Bright Start College Savings	Direct	
	Michigan Education Savings Program	Direct	
	Utah Educational Savings Plan	Direct	
<b>Silver</b> 11 Direct Plans	Alaska – T. Rowe Price	Direct	
	California – ScholarShare	Direct	
	Georgia – Path2College	Direct	Upgrade from Neutral
	Maryland College Investment Plan	Direct	
	Minnesota College Savings Plan	Direct	
	Missouri – MOST	Direct	
	Nevada Vanguard 529 College Savings Plan	Direct	
	New York's 529 Program	Direct	
	Ohio – CollegeAdvantage	Direct	
	Oregon College Savings Plan	Direct	
	Pennsylvania 529 Investment Plan	Direct	
<b>Bronze</b> 16 Direct Plans 2 Advisor Plans	Alabama – CollegeCounts 529 Fund	Direct	
	Arizona – Fidelity	Direct	
	Colorado – CollegenInvest	Direct	
	Connecticut Higher Education Trust	Direct	
	Delaware College Investment Plan	Direct	
	Florida 529 Savings Plan	Direct	
	Idaho – IDEAL	Direct	
	Massachusetts – U.Fund	Direct	
	North Carolina – National College Savings Program	Direct	
	Nebraska Educational Savings Trust	Direct	
	New Hampshire – UNIQUE	Direct	
	Oklahoma College Savings Plan	Direct	
	South Carolina – Future Scholar	Direct	
	Virginia – Invest529	Direct	Downgrade from Silver
	Washington – DreamAhead	Direct	
	Wisconsin – Edvest	Direct	
Ohio – BlackRock CollegeAdvantage	Advisor		
Virginia – CollegeAmerica	Advisor		

Source: Morningstar as of October 26, 2021

# Morningstar 2021 Ratings – Changes from 2020, continued

	Program	Plan Type	Rating Change
<b>Neutral</b> 11 Direct Plans 12 Advisor Plans	Arkansas – GIFT	Direct	
	District of Columbia – DC College Savings	Direct	
	Indiana – CollegeChoice	Direct	
	Iowa – College Savings Iowa	Direct	<b>Downgrade from Bronze</b>
	Kansas – Learning Quest	Direct	
	Kansas – Schwab 529	Direct	
	Maine – NextGen Direct	Direct	
	Nebraska – Bloomwell	Direct	
	New Jersey – NJBEST	Direct	<b>Upgrade from Negative</b>
	New Mexico – The Education Plan	Direct	<b>Downgrade from Bronze</b>
	North Dakota – College SAVE <sup>1</sup>	Direct	
	Alabama – CollegeCounts	Advisor	
	Alaska – John Hancock	Advisor	
	Colorado – Scholars Choice College Savings	Advisor	<b>Upgrade from Negative</b>
	Connecticut – CHET Advisor	Advisor	<b>New Rating</b>
	Illinois – Bright Directions	Advisor	<b>Downgrade from Bronze</b>
	Indiana – CollegeChoice	Advisor	<b>Upgrade from Negative</b>
	Nebraska Educational Savings Trust	Advisor	
	New Hampshire – Fidelity Advisor	Advisor	
	New York's 529 Program	Advisor	<b>Downgrade from Bronze</b>
	Rhode Island – CollegeBound 529	Advisor	
	South Carolina – Future Scholar	Advisor	
	West Virginia – Hartford SMART529	Advisor	
<b>Negative</b> 2 Direct Plans 5 Advisor Plans	Nevada – SSgA Upromise	Direct	<b>Downgrade from Neutral</b>
	Nevada – USAA	Direct	
	Maine – NextGen Select	Advisor	
	New Jersey – Franklin Templeton	Advisor	
	New Mexico – Scholar's Edge	Advisor	<b>Downgrade from Neutral</b>
	South Dakota – CollegeAccess 529	Advisor	
	Wisconsin – Tomorrow's Scholar	Advisor	

Source: Morningstar as of October 26, 2021

<sup>1</sup> Morningstar characterizes North Dakota as an Advisor Plan; for purposes of this compilation we continue to show it as Direct

# CHET 2021 Rating Comments

Direct	Advisor
<ul style="list-style-type: none"> <li>• “new program manager with a robust asset-allocation team, Fidelity Investments”</li> <li>• “well-resourced and experienced teams at Fidelity”</li> <li>• Strong Fidelity funds upgrade People rating</li> <li>• Index track is cheap but blend and active tracks “cost more than the plan’s previous offerings” and lead to a Price Pillar rating downgrade</li> </ul>	<ul style="list-style-type: none"> <li>• “comes at a high cost, dulling otherwise strong features”</li> <li>• “Fidelity’s solid managers and asset-allocation group merit an Above Average People rating”</li> <li>• “age-based portfolios are exceedingly expensive, driving a High Price rating”</li> </ul>
Direct and Advisor	
<ul style="list-style-type: none"> <li>• Enhanced with a progressive glidepath</li> <li>• “measured, research-driven improvements” result in an Above Average Process rating</li> <li>• Focus on “enhancing diversification and improving resiliency in various markets”</li> <li>• Frequent CIO turnover is concerning but otherwise stable staff – Parent Pillar rating remains Average</li> </ul>	

Source: Morningstar as of October 26, 2021

## Appendix 2

# AKF Consulting Group Overview

## AKF at a Glance

- ***Leading strategic advisor*** to State-run Investment Programs nationwide
- Unique perspective based upon ***public and private sector*** experience
- Team foundation built upon ***75 years of combined experience***
- Deep understanding of all aspects of ***program establishment, launch and ongoing operations***
- Unrivaled experience with ***procurement and contract amendment*** processes

# AKF – A Deeper Dive

- **Leading strategic advisor to State-run Investment Programs nationwide:**
  - **SEC- and MSRB-registered Municipal Advisor**
  - **529, ABLE and State-run Retirement clients include 45 different issuers across 35 States, including:**
    - **Treasurers and Comptrollers**
    - **Higher Education Authorities and Boards of Regents**
    - **Program-specific independent public entities**
- **Unique perspective based upon AKF professionals' public and private sector experience for the exclusive benefit of the public sector**
- **AKF professionals represent significant State-run Investment Program experience:**
  - **Public sector creation and management of largest 529 and ABLE Partnership Programs**
  - **Private sector design, launch and management of multiple 529 Programs**
  - **Public retirement fund Board leadership**
  - **Retirement planning and IRA administration, management and marketing**
  - **Consulting advice on 529, ABLE and State-run Retirement Program initiatives**

## AKF – A Deeper Dive, continued

- **Deep understanding of all aspects of program establishment, launch and ongoing management**
- **General expertise includes Board creation, education and training, advice on regulatory matters, plan design, operations, marketing and outreach, investments, and disclosure**
- **Unrivaled experience with procurement and contract amendment processes for:**
  - **Administrative services (including recordkeeping and call center functions)**
  - **Investment management services**
  - **Program manager services**
  - **Investment consultants**
- **Ongoing monitoring of all industry trends and developments, including legislative and regulatory initiatives**



# Our Consulting Team

<p><b>Senior Leaders</b></p>	<p><b>Andrea Feirstein</b>  <b>Managing Director</b>  <i>Overall Responsibility</i>  <b>(MA)</b></p>		<p><b>Diana Cantor</b>  <b>Managing Director</b>  <i>Governance and Fiduciary Matters</i>  <b>(Non-MA)</b></p>		
<p><b>Topic Expertise</b></p>	<p><b>Ellen Breslow</b>  <b>Senior Consultant</b>  <i>Retirement and IRA Marketing</i>  <b>(Non-MA)</b></p>	<p><b>Mark Chapeau</b>  <b>Senior Consultant</b>  <i>Legal, Regulatory and Disclosure</i>  <b>(Non-MA)</b></p>	<p><b>Juliana Crist</b>  <b>Senior Consultant</b>  <i>Launch Expertise and Oversight</i>  <b>(Non-MA)</b></p>	<p><b>Derek DeLorenzo</b>  <b>Senior Consultant</b>  <i>Project Plan Management</i>  <b>(MA)</b></p>	<p><b>Sean McInerney</b>  <b>Senior Consultant</b>  <i>Operations</i>  <b>(Non-MA)</b></p>
<p><b>Technical Analytics</b></p>	<p><b>Martin Feinstein</b>  <b>Senior Consultant</b>  <i>Metrics and Projections</i>  <b>(Non-MA)</b></p>		<p><b>Soohyang Lee, CFA</b>  <b>Vice President</b>  <i>Program Expertise</i>  <b>(MA)</b></p>		<p><b>Kiran Siddique</b>  <b>Associate</b>  <i>Analytic Expertise</i>  <b>(MA)</b></p>
<p><b>Compliance</b></p>	<p><b>Kimberly McManus</b>  <b>External Chief Compliance Officer</b>  <i>Compliance</i>  <b>(Non-MA)</b></p>				

MA = Municipal Advisor; Non-MA = Non-Municipal Advisor



# Andrea Feirstein, Managing Director



- **Thirty-plus years of experience in municipal finance industry, including:**
  - **Head of 529 business for Citigroup Asset Management (now Legg Mason, a Franklin Templeton affiliate)**
  - **Municipal investment banker at Salomon Smith Barney (now Citigroup Municipal Securities Division)**
  - **Bond lawyer at Brown & Wood (now Sidley Austin LLP)**
- **B.S. from Georgetown University (School of Foreign Service)**
- **J.D. from University of Virginia School of Law**
  - **Editor-in-Chief, *Virginia Tax Review***
- **SEC-registered and MSRB-licensed Municipal Advisor (Series 50) and Municipal Principal (Series 54)**
- **Board member, National Institute of Public Finance**
- **Board member, Build NYC, New York City Industrial Development Agency, New York City Randall's Island Park Alliance (Treasurer) (Chair, Finance Committees of all three)**
- **Past Chair, NAST Corporate Affiliate Advisory Board and CSPN Corporate Affiliate Committee**
- **Member, MSRB Municipal Fund Securities Advisory Group**

## Diana Cantor, Managing Director



- **Former Trustee and Chair of Virginia Retirement System**
- **Founding Chief Executive Officer of Virginia College Savings Plan**
- **Thirty-plus years of legal, investment and financial services experience, including:**
  - **Vice President at Goldman Sachs (leveraged buyout and internal investment funds and merchant banking/principal investment operations)**
  - **Real Estate Lawyer at Kaye Scholer (now Arnold & Porter)**
- **B.S. from University of Florida (School of Accounting)**
- **M.B.A. from University of Miami**
- **J.D. from New York University School of Law**
- **Certified Public Accountant**
- **Member of State Bar in Florida, New York and Virginia**
- **Public or Private Company Board member, current: Domino's Pizza Inc., Universal Corporation, VICI Properties, Inc., Mauser Packaging Solutions, Stone Canyon Industries, Cerity Partners and Valor Ventures; past: Media General Inc., Revlon Inc., The Edelman Financial Group Inc., Knowledge Universe, Service King Collision Centers and Vistage International**
- **Past Chair, College Savings Plans Network**

## Ellen Breslow, CRPS, Senior Consultant



- **Creator of Retirement Resources Group at Citigroup**
- **Twenty-six years of retirement experience at Citigroup Smith Barney's Global Wealth Management, including:**
  - **Managing Director of Financial, Education and Retirement Planning Services**
  - **Business Manager for Smith Barney's Financial Planning Desktop applications and Smith Barney prototype IRA and Qualified Plan documents**
  - **Head of marketing and strategy unit for individual retirement planning services**
  - **Involved in the integration of IRA programs to Citigroup IRA platforms from acquired financial services firms**
- **B.S. from Lehigh University**
- **FINRA-licensed Investment Company/Variable Contracts Products Limited Representative (Series 6), General Securities Representative (Series 7), General Securities Principal (Series 24) and Municipal Fund Securities Limited Principal (Series 51)**
- **Chartered Retirement Plan Specialist (CRPS)**

## Mark Chapleau, Senior Consultant



- **Over eighteen years of State-run Investment Programs experience across twenty-seven States**
- **Over thirty years in the financial services industry, including:**
  - **Former President and General Counsel of Upromise Investments**
  - **Former Senior Legal Counsel at Fidelity Investments**
- **Expertise in (i) tax and securities regulatory and legal issues, (ii) contract matters and (iii) program offering documents and marketing disclosures**
- **B.A. from University of Connecticut**
- **J.D. from Brooklyn Law School, Dean's Merit Scholarship**
- **Member, Legal and Regulatory Affairs Committees of College Savings Foundation and College Savings Plans Network**

## Juliana Crist, Senior Consultant



- Served as the founding Director of Ohio's STABLE Account, the nation's first 529A program, overseeing all aspects of State administration
- Deep experience leading marketing and growth efforts of State-run programs, including development of advertising collateral and in-person outreach
- Over eleven years of State-run Investment Program and legal experience, including:
  - Independent 529A industry consulting
  - Vice President at True Link Financial
  - Clerk at Supreme Court of Ohio
  - Counsel at Tucker Ellis LLP
- B.A. from The Ohio State University (dual degree)
  - Double summa cum laude
- J.D. from Case Western Reserve School of Law
  - Summa cum laude, Salutatorian
  - Senior Editor of the Law Review
- Member of State Bar in Ohio

## Derek DeLorenzo, Senior Consultant



- **Track record of working with compliance, legal, sales, business development, recordkeeping platform technology and client service operations**
- **Over twenty-seven years of experience managing major components of financial services organizations, including:**
  - **Senior Director of Upromise 529 Programs at Prodege, LLC**
  - **Former Senior Vice President of Client Relationship Management at Ascensus College Savings, including responsibility for Advisor Sales, Investment Management and Marketing teams**
  - **Former Director of Operation for John Hancock Freedom 529**
- **B.A. from Fairfield University**
- **SEC-registered and MSRB-licensed Municipal Advisor (Series 50)**

## Martin Feinstein, Senior Consultant



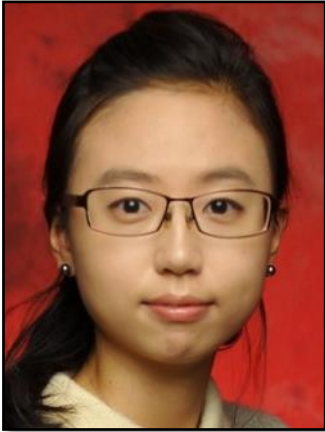
- Over 39 years of experience with financial analysis and modeling
- Career in public finance investment banking at First Boston Corporation and Smith Barney (now Citigroup), including leadership of Finance Structuring Group within Municipal Securities Division at Smith Barney
- Responsibilities included:
  - Creation and execution of municipal financing plans
  - Development of user-friendly financial models for municipalities
  - Leadership of analyst training and development courses
- Leads AKF's quantitative modeling initiatives, including oversight of customized model development, multiple scenario analysis, and quality control oversight for client deliverables
- B.S. from State University of New York at Albany

## Sean McInerney, Senior Consultant



- **Over eighteen years of experience with College Savings and ABLE Programs representing twenty-five States**
- **Over twenty years of experience in the financial services industry including:**
  - **Founder and Managing Partner at EJM Group, Inc.**
  - **Senior Vice President of Upromise Investments**
- **Key roles in the design and execution a new state-of-the-art college savings platform, the launch of three College Savings Plans and asset conversions for twenty-five 529 Plans**
- **B.A. from Bridgewater State College**

## Soohyang Lee, CFA, Vice President



- Ten years of State-run Investment Program experience
- Provides program and technical expertise on 529, ABLE and State-run Retirement client matters
- Advises on program matters generally including Morningstar strategic reviews, investment option changes, and growth and revenue projections of 529, ABLE and State-run Retirement Programs
- Assists with various aspects of vendor procurement, including drafting and reviewing requests for proposals and providing scoring and cost analyses
- B.S. from the University of Virginia (McIntire School of Commerce)
- SEC-registered and MSRB-licensed Municipal Advisor (Series 50)
- CFA charterholder (CFA)

## Kiran Siddique, Associate



- **Three-plus years of combined State-run Investment Program and private equity experience**
- **Responsible for research and analytical work related to 529, ABLE and State-run Retirement Programs**
- **Reviews and analyzes data on industry trends for clients and manages databases**
- **Assists in various aspects of program manager procurement, including proposal development and program manager evaluation**
- **Prior experience includes work at Federal Reserve Board in Washington D.C., as well as at private equity, derivatives trading and wealth management firms in Singapore, Shanghai and New York**
- **B.A. from New York University**
- **SEC-registered and MSRB-licensed Municipal Advisor (Series 50)**

# AKF Legal Disclosure

Pursuant to Municipal Securities Rulemaking Board (“MSRB”) Rule G-42, on Duties of Non-Solicitor Municipal Advisors, Municipal Advisors are required to make certain written disclosures to clients and potential clients which include, among other things, Conflicts of Interest and Legal or Disciplinary events of AKF and its associated persons.

## **Conflicts of Interest**

### ***Compensation***

AKF represents that in connection with the issuance of municipal fund securities, AKF receives compensation from its client issuers for services rendered on an hourly, retainer or fixed fee basis. Consistent with the requirements of MSRB Rule G-42, AKF hereby discloses that such forms of compensation may present a potential conflict of interest regarding AKF’s ability to provide unbiased advice regarding a municipal fund security transaction. This potential conflict of interest will not impair AKF’s ability to render unbiased and competent advice or to fulfill its fiduciary duty.

### ***Other Municipal Advisor Relationships***

AKF serves a wide variety of clients that may from time to time have interests that could have a direct or indirect impact on the interests of other AKF clients. For example, AKF serves as Municipal Advisor to other municipal fund securities clients and, in such cases, owes a regulatory duty to such clients just as it will with the entity receiving this presentation, if hired. These other clients may, from time to time and depending on the specific circumstances, have competing interests. In acting in the interests of its various clients, AKF could potentially face a conflict of interest arising from these competing client interests. AKF fulfills its regulatory duty and mitigates such conflicts by dealing honestly and with the utmost good faith with all clients.

If AKF becomes aware of any potential or actual conflicts of interest after this disclosure, AKF will disclose the detailed information in writing to the client or obligated person in a timely manner.

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