



SANTA CLARA UNIVERSITY

Consolidated Financial Statements and Auditor's Reports
in Accordance with the Uniform Guidance

June 30, 2021

(With Summarized Comparative Financial Information as
of and for the year ended June 30, 2020)

(With Independent Auditors' Report Thereon)

SANTA CLARA UNIVERSITY
Consolidated Financial Statements

Table of Contents

	Page(s)
Independent Auditors' Report	1–2
Consolidated Financial Statements:	
Consolidated Balance Sheet	3
Consolidated Statement of Activities	4
Consolidated Statement of Cash Flows	5
Notes to Consolidated Financial Statements	6–30
Supplementary Schedule of Financial Responsibility Data	31
Independent Auditors' Report on Internal Control over Financial Report and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i>	32–33
Independent Auditors' Report on Compliance for Each Major Federal Program and Report on Internal Control over Compliance Required by the Uniform Guidance; and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance	34–35
Schedule of Expenditures of Federal Awards	36–37
Notes to Schedule Expenditures of Federal Awards	38
Schedule of Findings and Questioned Costs	39



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Independent Auditors' Report

The Board of Trustees
Santa Clara University:

Report on the Financial Statements

We have audited the accompanying consolidated financial statements of Santa Clara University (the University), which comprise the consolidated balance sheet as of June 30, 2021, and the related consolidated statements of activities and cash flows for the year then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

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

Auditors' Responsibility

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

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

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

Opinion

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the consolidated financial position of Santa Clara University as of June 30, 2021, and the changes in their net assets and their cash flows for the year then ended in accordance with U.S. generally accepted accounting principles.



Other Matter

Our audit was conducted for the purpose of forming an opinion on the consolidated financial statements as a whole. The accompanying Supplementary Schedule of Financial Responsibility Data as of and for the year ended June 30, 2021 is presented for purposes of additional analysis, as required by the US Department of Education, and is not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the consolidated financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the financial responsibility schedule is fairly stated, in all material respects, in relation to the consolidated financial statements as a whole.

Report on Summarized Comparative Information

We have previously audited the University's 2020 consolidated financial statements, and we expressed an unmodified audit opinion on those audited consolidated financial statements in our report dated October 16, 2020. In our opinion, the summarized comparative information presented herein as of and for the year ended June 30, 2020 is consistent, in all material respects, with the audited consolidated financial statements from which it has been derived.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated October 18, 2021, except as to the Supplementary Schedule of Financial Responsibility Data, which is as of December 22, 2021, on our consideration of the University's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the University's internal control over financial reporting and compliance.

KPMG LLP

Santa Clara, California

October 18, 2021, except as to Note 17
and our report on the supplementary
schedule of financial responsibility data,
which is as of December 22, 2021

SANTA CLARA UNIVERSITY

Consolidated Balance Sheet

June 30, 2021

(With comparative financial information as of June 30, 2020)

(In thousands of dollars)

Assets	2021	2020
Cash and cash equivalents	\$ 54,515	54,317
Contributions receivable, net	64,142	76,441
Student and other receivables, net	8,364	13,228
Investments	1,733,014	1,213,939
Funds held in trust by others	26	1,367
Other assets	11,910	10,106
Right of use assets	38,380	—
Property, plant and equipment, net	1,049,803	1,024,103
Total assets	\$ 2,960,154	2,393,501
Liabilities and Net Assets		
Liabilities:		
Accounts payable and accrued expenses	\$ 66,178	67,479
Deposits and deferred revenue	31,688	31,057
Amounts held on behalf of others	92,156	57,192
Annuity and trust obligations	8,796	7,281
Asset retirement obligations	3,054	2,908
Bonds and notes payable	335,007	343,191
Lease liabilities	50,686	53,891
U.S. government loan advances	3,234	4,399
Total liabilities	590,799	567,398
Net assets:		
Without donor restrictions	856,913	744,846
With donor restrictions	1,512,442	1,081,257
Total net assets	2,369,355	1,826,103
Total liabilities and net assets	\$ 2,960,154	2,393,501

See accompanying notes to consolidated financial statements.

SANTA CLARA UNIVERSITY

Consolidated Statement of Activities

Year ended June 30, 2021

(With summarized financial information for the year ended June 30, 2020)

(In thousands of dollars)

	2021			2020
	Without donor Restrictions	With donor Restrictions	Total	
Operating:				
Revenues:				
Net tuition and fees (includes student financial aid of \$116,793 and \$114,054 in 2021 and 2020, respectively)	\$ 276,447	—	276,447	283,419
Contributions to annual funds	1,396	—	1,396	3,566
Grant revenues	7,826	—	7,826	6,694
Net return on operating investments	2,905	—	2,905	4,264
Other revenues	7,751	—	7,751	13,083
Auxiliary activities	8,710	—	8,710	34,645
Nonoperating net assets used in operations:				
Endowment appropriations used in operations	40,087	—	40,087	39,156
Released contributions used in operations	18,742	—	18,742	14,205
Total operating revenues and other support	363,864	—	363,864	399,032
Expenses:				
Academic related salaries and wages	113,772	—	113,772	115,764
Nonacademic salaries and wages	66,738	—	66,738	71,698
Benefits	57,373	—	57,373	64,232
Professional fees and contracted services	30,019	—	30,019	33,363
General operating expenses	43,018	—	43,018	56,359
Interest	10,325	—	10,325	13,660
Depreciation and amortization	51,557	—	51,557	51,078
Total expenses	372,802	—	372,802	406,154
Decrease in net assets from operations	(8,938)	—	(8,938)	(7,122)
Nonoperating:				
Contributions	506	81,729	82,235	66,270
Net return on nonoperating long-term investments	96,517	437,204	533,721	39,866
(Loss) gain on disposal of assets	261	—	261	(130)
Endowment appropriations used in operations	(40,087)	—	(40,087)	(39,156)
Released contributions used in operations	(18,742)	—	(18,742)	(14,205)
Net assets released from restrictions	83,438	(83,438)	—	—
Other changes, net	(888)	(4,310)	(5,198)	3,669
Change in net assets	112,067	431,185	543,252	49,192
Net assets at beginning of year	744,846	1,081,257	1,826,103	1,776,911
Net assets at end of year	\$ 856,913	1,512,442	2,369,355	1,826,103

See accompanying notes to consolidated financial statements.

SANTA CLARA UNIVERSITY

Consolidated Statement of Cash Flows

Year ended June 30, 2021

(With comparative financial information for the year ended June 30, 2020)

(In thousands of dollars)

	<u>2021</u>	<u>2020</u>
Cash flows from operating activities:		
Change in net assets	\$ 543,252	49,192
Adjustments to reconcile change in net assets to net cash provided by operating activities:		
Depreciation and amortization	51,557	51,078
Accrued interest on zero coupon bonds	309	(183)
Amortization of original bond issue discount/premium and issuance costs	(964)	(980)
Loss (gain) on disposal of assets	(261)	130
Noncash gifts	(13,409)	(9,232)
Proceeds from sale of donated securities	929	5,077
Net realized and unrealized gain on investments	(527,706)	(34,366)
Contributions restricted for long-term investment	(71,639)	(55,170)
Changes in operating assets and liabilities:		
Contributions receivable	12,299	6,890
Student and other receivables	4,864	(630)
Other assets	(1,804)	98
Accounts payable and accrued expenses	(8,141)	(17,503)
Deposits and deferred revenue	631	2,395
Amounts held on behalf of others	34,964	2,409
Annuity and trust obligations	1,515	(131)
Asset retirement obligations	146	93
Net cash provided by (used in) operating activities	<u>26,542</u>	<u>(833)</u>
Cash flows from investing activities:		
Purchase of investments	(272,416)	(411,244)
Proceeds from sale of investments	290,147	440,273
Purchase of property, plant and equipment	(111,790)	(118,835)
Proceeds from sale of plant assets	3,302	—
Net cash used in investing activities	<u>(90,757)</u>	<u>(89,806)</u>
Cash flows from financing activities:		
Payments on bonds and notes payable	(7,529)	(6,422)
Draw downs from bond trustee for qualified expenditures	1,341	16,433
Principal payments on lease obligations	(3,205)	(3,514)
Change in U.S. government loan advances, net	(1,165)	(2,470)
Proceeds from sale of donated securities and real estate	3,332	4,155
Contributions restricted for long-term investment	71,639	55,170
Net cash provided by financing activities	<u>64,413</u>	<u>63,352</u>
Net increase (decrease) in cash and cash equivalents	198	(27,287)
Cash and cash equivalents at beginning of year	<u>54,317</u>	<u>81,604</u>
Cash and cash equivalents at end of year	\$ <u>54,515</u>	\$ <u>54,317</u>
Supplemental disclosures of cash flow information:		
Cash paid during the year for interest	\$ 17,502	17,956
The University received noncash gifts of:		
Marketable and non-marketable securities	\$ 13,361	9,232
Equipment	48	—
Noncash investing and financing activities:		
Purchase of property, plant and equipment in Accounts Payable	\$ 6,840	18,540

See accompanying notes to consolidated financial statements.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(1) Organization and Summary of Significant Accounting Policies

(a) Organization

The President and Board of Trustees of Santa Clara College (dba Santa Clara University) is an independent, coeducational institution of higher learning offering undergraduate and graduate degrees in more than 50 fields of study. Santa Clara University was founded in 1851 by the Society of Jesus on the site of Mission Santa Clara de Asis in Northern California. The Jesuit School of Theology of Santa Clara University and the Bronco Bench Foundation are affiliated entities and their financial information has been consolidated with Santa Clara University (collectively referred to as the University) and all interaffiliate transactions have been eliminated.

The University's primary source of revenue is tuition and fees from undergraduate, graduate, and law programs through the College of Arts & Sciences, Leavey School of Business, and the schools of Engineering, Education and Counseling Psychology, and Law as well as the Jesuit School of Theology. Other sources of revenue include room and board, contributions, grants, return on investments, and other sales and services

(b) Basis of Presentation

The University displays its net assets and activities based on the existence or absence of donor-imposed restrictions. Accordingly, net assets of the University and changes therein are classified and reported as net assets without donor restrictions and net assets with donor restrictions. Refer to note 1(s) and note 2 for further information regarding net asset classifications.

(c) Cash and Cash Equivalents

Cash and cash equivalents consist primarily of operating cash, money market funds, and treasury instruments with original maturities of three months or less. Assets with characteristics of cash and cash equivalents that are held in endowment funds are reported as investments and not included in cash and cash equivalents within the statement of cash flows.

(d) Contributions

Unconditional promises to give are initially recorded at fair value. In subsequent periods, unconditional promises to give are recorded at the estimated net present value, net of an allowance for uncollectible amounts, and are classified in the appropriate net asset category. The University records contributions of land, buildings, or equipment as revenue without donor restriction unless the donor places restrictions on their use.

(e) Investments

In accordance with U.S. generally accepted accounting principles, the University reports investments at fair value based upon a three-level valuation hierarchy for disclosure of fair value measurements. The valuation hierarchy is based upon the transparency of inputs to the valuation of an asset or liability as of the measurement date. The three levels are defined as follows:

Level 1 – Inputs are unadjusted quoted prices in active markets for identical assets or liabilities.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

Level 2 – Inputs of other than quoted prices included in Level 1 that are observable for the asset or liability, either directly or indirectly. This includes quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability, or inputs that are derived principally from or corroborated by observable market data.

Level 3 – Inputs are unobservable for the asset or liability. Unobservable inputs reflect the University's own assumptions about the assumptions that market participants would use in pricing the asset or liability developed based on the best information available in the circumstances.

A financial instrument's categorization within the valuation hierarchy is based upon the lowest level of input that is significant to the fair value measurement.

The majority of the University's investments are held through limited partnerships and commingled funds for which fair value is estimated using net asset value (NAV) reported by fund managers as a practical expedient, in accordance with Accounting Standards Update No. 2015-07 (ASU 2015-07), *Fair Value Measurement Disclosures for Investments in Certain Entities that Calculate NAV per Share (or its Equivalent)*. Such assets are not classified in the fair value hierarchy.

(f) Funds Held in Trust by Others

Funds held in trust by others consist of the unexpended proceeds of bonds payable which will be used for construction of certain facilities.

(g) Fair Value of Financial Instruments

The University did not elect fair value accounting for any asset or liability that is not currently required to be measured at fair value.

Fair value of the University's financial instruments is determined using the estimates, methods, and assumptions as set forth below. See note 5 for further information regarding investments and their fair value.

(i) Cash Equivalents, Student and Other Receivables, Accounts Payable, and Accrued Expenses

Fair value approximates book value due to the short maturity of these instruments. A reasonable estimate of the fair value of student loans extended under government loan programs has not been made as the loans can only be assigned to the U.S. government or its designees.

(ii) Contributions Receivable

Contributions receivable are reported based on the discounted value of estimated cash flows. Pledges are discounted at an interest rate that reflects the risks inherent in those cash flows. These inputs to the fair value estimate are considered Level 3 in the fair value hierarchy. Book value approximates fair value.

(iii) Funds Held in Trust by Others

Funds held in trust by others are reported at fair value and are invested in short-term, highly liquid securities considered Level 1 in the fair value hierarchy.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(iv) Leases

The University's lease obligations bear interest at rates which approximate prevailing market rates for instruments with similar characteristics and, accordingly, the carrying value approximates fair value.

(v) Alternative Investments

Alternative investments, such as private equity interests, are recorded based on valuations provided by the general partners or external investment managers. As these generally are investments without a ready market to compare, the inputs into the determination of fair value require significant judgment. Due to the inherent uncertainty of these estimates, these values may differ materially from the values that would have been used had a ready market for these investments existed. Management reviews and evaluates the valuations and has determined that the valuation methods and assumptions result in reasonable estimates of fair value.

(vi) Annuity and Trust Obligations

The carrying amount of annuity and trust obligations approximates fair value as the instruments are recorded at the estimated net present value of future cash flows. The estimated fair value, however, involves unobservable inputs considered to be Level 3 in the fair value hierarchy.

(h) Collections

The University's collections are made up of artifacts of historical significance and art objects that are held for educational, research, and curatorial purposes. The collections, which have been acquired through contributions since the University's inception, are not recognized as assets in the accompanying consolidated balance sheet.

(i) Property, Plant and Equipment

Property, plant and equipment assets are stated at cost at the date of acquisition, or fair value at the date of donation in the case of gifts in kind. Depreciation of property, plant, and equipment assets is computed using the straight-line method over estimated useful lives of 3 to 50 years. Amortization of right of use assets is provided over the estimated useful lives of the assets or over the life of the lease, as applicable, using the straight-line method.

(j) Deposits and Deferred Revenue

Deposits and deferred revenue consist of deposits and tuition and fees collected for not yet completed summer and fall terms and other miscellaneous deferred revenue. Deposits and deferred revenue relating to tuition and fee revenue, less any refunds issued, will be recognized as revenue as services are rendered over the academic terms occurring in the year ending June 30, 2022. Also included in deposits and deferred revenue is \$6,802,000 which relates to a contract agreement. Revenue for this contract will be recognized each year over the life of the contract which expires in June 2030. The University applies the practical expedient in Accounting Standards Codification (ASC) 606-10-50-14 and therefore does not disclose information about performance obligations that have an origination and expected duration within the fiscal year.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(k) Annuity and Trust Obligations

The University has a variety of gift agreements, including charitable gift annuities and charitable remainder trusts, for which the University is the trustee. An estimated liability has been recorded for charitable gift annuities based upon Internal Revenue Service (IRS) actuarial tables. For charitable remainder trusts, the difference between the fair value of trust investments and the estimated University's remainder interests has been recorded as a liability.

(l) Bond Premiums and Issuance Costs

Bond premiums and issuance costs are amortized using a method that approximates the effective interest method over the life of the associated bond issue. Bond premiums are included in bonds and notes payable, and issuance costs are netted against bonds and notes payable in the accompanying consolidated balance sheet.

(m) Revenue Recognition

Student tuition, fees, and room and board are recognized in the period the services are provided. Institutional scholarships awarded to students reduce the amount of revenue recognized. In addition, students who adjust their course load or withdraw completely within the first three weeks of the academic term may receive a full or partial refund in accordance with the University's refund policy. Refunds issued reduce the amount of revenue recognized. Payments for tuition are due approximately three to four weeks prior to the start of the academic term. Contributions, including unconditional promises to give, are recognized in the period received and are reported as increases in the appropriate category of net assets. Conditional contributions are not recorded as revenue until the conditions on which they depend have been substantially met. Return on investments are recorded on the accrual basis of accounting. Other sources of revenue are recognized in the fiscal year in which they are earned.

In response to the COVID-19 pandemic, the United States Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act on March 27, 2020. The University recognized \$7,515,000 and \$772,000 as of June 30, 2021 and 2020, respectively, in gift revenue as a result of the CARES Act. The portion used to award COVID-19 relief to students is included in operating expenses and the remaining amount was used to offset lost revenues and refunds of housing and dining charges.

(n) Credit Concentration

Financial instruments that potentially subject the University to concentration of credit risk are cash, cash equivalents, investments, and receivables. The University's cash, cash equivalents, and investments are held by recognized financial institutions. The University deposits its cash with several financial institutions and its deposits, at times, exceed insured amounts. The University requires its investment managers to follow the University's investment policy, and the investment managers are subject to periodic review by the University's investment committee. The University's investments are comprised primarily of a diversified portfolio of marketable equity securities, investment-grade debt and alternative assets. The credit risk with respect to student receivables is considered minimal due primarily to the wide dispersion of the receivables. Of the \$80,631,000 of gross contributions receivable at June 30, 2021, \$60,367,000 is due from ten donors.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(o) Operations

Operating activities in the accompanying consolidated statements of activities include all revenues earned without donor restrictions and all expenses incurred by the University except nonoperating contributions, net return on nonoperating long-term investments underlying board designated endowments, (loss) gain on disposal of assets, and certain nonrecurring activities.

(p) Use of Estimates

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

(q) Prior Year Summarized Comparative Information

The consolidated financial statements include certain prior year summarized comparative information in total but not by net asset class. Such information does not include sufficient detail to constitute a presentation in conformity with U.S. generally accepted accounting principles. Accordingly, such information should be read in conjunction with the University's financial statements for the year ended June 30, 2020, from which the summarized information was derived.

(r) Reclassifications

Certain reclassifications have been made to the 2020 comparative information to conform to the 2021 financial statement presentation.

(s) Recent Accounting Pronouncements

In February 2016, the FASB issued ASU 2016-02, Leases (Topic 842) that requires, among other things, a lessee to recognize a right-of-use asset representing an entity's right to use the underlying asset for the lease term and a liability for lease payments on the statement of financial position, regardless of classification of a lease as an operating or finance lease.

Effective July 1, 2020, the University adopted ASU 2016-02, Leases (Topic 842), as amended. Key provisions in this guidance include additional disclosure surrounding the amount, timing and uncertainty of the cashflows arising from leases. The University elected the package of practical expedients permitted in ASC 842. Accordingly, the University accounted for its existing operating leases as an operating lease under the new guidance, without reassessing (a) whether the contract contains a lease under ASC 842, (b) whether classification of the operating lease would be different in accordance with ASC 842, or (c) whether the unamortized initial direct costs before transition adjustments (as of June 30, 2020) would have met the definition of initial direct costs in ASC 842 at lease commencement.

In addition, the University opted for the transition relief method specified in Accounting Standards Update No. 2018-11, which allowed for the effective date of the new lease standard as the date of initial application on transition. As a result of this election the University (a) did not adjust comparative period financial information for the effects of ASC 842; (b) made the new required lease disclosures for periods after the effective date; and (c) carried forward ASC 840 disclosures for comparative periods.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

Refer to footnote 9 for further discussion of the effect of the implementation.

(f) Current Environment

In March 2020, the World Health Organization declared the novel coronavirus (COVID-19) a pandemic. Commencing March 2020, undergraduate and graduate course instruction was conducted virtually and most students vacated the campus. Students continued to meet their academic requirements for the 2020-21 academic year within a mostly virtual learning environment. Students, and most faculty and staff returned to campus in September 2021 to support mostly in-person classes and program activities.

The University continues to implement precautionary measures to continue operations consistent with the guidance of government authorities and is prepared to take additional measures to protect the health of the University community and promote the continuity of its academic mission. The Board of Trustees and the University's management are actively monitoring the outbreak and potential financial impact. The duration and intensity of the impact of the coronavirus and resulting disruption to the University's operations are uncertain and could adversely affect financial results.

(2) Net Assets

Net assets are reported in two categories based on the existence or absence of donor-imposed restrictions, as follows:

- Net assets without donor restrictions represent net assets that are not subject to donor-imposed restrictions and are available for use in general operations or invested in property, plant and equipment. Net assets without donor restrictions may be designated for specific purposes by action of the board.
- Net assets with donor restrictions represent net assets that are subject to the following donor-imposed restrictions:
 - Net assets with donor restrictions for time and purpose represent net assets with donor-imposed restrictions that will be met either by actions of the University or the passage of time. When restrictions expire or assets are expended according to donor restrictions, net assets are reclassified to net assets without restrictions and are reported in the consolidated statement of activities as net assets released from restrictions.
 - Net assets with donor-imposed restrictions in perpetuity represent net assets subject to donor-imposed restrictions that are to be permanently maintained by the University. These consist of assets donated with stipulations that they be invested to provide a permanent source of income. It is the policy of the University to maintain the historic dollar value of these gifts in perpetuity. Generally, donors of these assets permit the University to use all or part of the income earned on related investments for general or specific purposes.

SANTA CLARA UNIVERSITY
Notes to Consolidated Financial Statements
June 30, 2021

Net assets consisted of the following as of June 30, 2021 (in thousands):

	<u>Without donor restrictions</u>	<u>With donor restrictions</u>	<u>Total net assets</u>
Without donor restrictions:			
Operations, scholarship support, other	\$ 146,193	—	146,193
Invested in property, plant, and equipment	438,642	—	438,642
Board-designated quasi-endowments	272,078	—	272,078
With donor restrictions for time and/or purpose:			
Donor-restricted quasi-endowment funds and unappropriated endowment earnings	—	910,261	910,261
Capital construction	—	140,553	140,553
Education and other program support	—	7,668	7,668
Financial aid and student loan program	—	4,799	4,799
Pledges	—	70,576	70,576
Annuity and life income funds	—	5,033	5,033
With donor restrictions in perpetuity:			
Financial aid endowments	—	182,574	182,574
Education and other program support endowments	—	113,146	113,146
Academic chair endowments	—	59,583	59,583
Pledges	—	8,532	8,532
Annuity and life income funds	—	9,717	9,717
	<u>\$ 856,913</u>	<u>1,512,442</u>	<u>2,369,355</u>

SANTA CLARA UNIVERSITY
Notes to Consolidated Financial Statements
June 30, 2021

Net assets consisted of the following as of June 30, 2020 (in thousands):

	<u>Without donor restrictions</u>	<u>With donor restrictions</u>	<u>Total net assets</u>
Without donor restrictions:			
Operations, scholarship support, other	\$ 124,275	—	124,275
Invested in property, plant, and equipment	438,515	—	438,515
Board-designated quasi-endowments	182,056	—	182,056
With donor restrictions for time and/or purpose:			
Donor-restricted quasi-endowment funds and unappropriated endowment earnings	—	508,245	508,245
Capital construction	—	118,046	118,046
Education and other program support	—	11,582	11,582
Financial aid and student loan program	—	5,266	5,266
Pledges	—	75,463	75,463
Annuity and life income funds	—	4,103	4,103
With donor restrictions in perpetuity:			
Financial aid endowments	—	175,443	175,443
Education and other program support endowments	—	108,935	108,935
Academic chair endowments	—	59,488	59,488
Pledges	—	7,840	7,840
Annuity and life income funds	—	6,846	6,846
	<u>\$ 744,846</u>	<u>1,081,257</u>	<u>1,826,103</u>

(3) Contributions Receivable

Contributions receivable consisted of the following as of June 30, 2021 and 2020 (in thousands):

	<u>2021</u>	<u>2020</u>
Unconditional promises to be collected in:		
Less than one year	\$ 12,602	17,805
One to five years	41,919	57,339
More than five years	26,110	9,697
	<u>80,631</u>	<u>84,841</u>
Less allowance for uncollectible contributions	(7,332)	(3,475)
Less discount to present value	(9,157)	(4,925)
	<u>\$ 64,142</u>	<u>76,441</u>

SANTA CLARA UNIVERSITY
Notes to Consolidated Financial Statements
June 30, 2021

The discount rate utilized for purposes of calculating the present value of contributions receivable ranges from 2.0% – 4.5% based on the year the unconditional promise to give is received. The discount rate is determined at the time the unconditional promise to give is initially recognized and is not revised subsequently.

(4) Student and Other Receivables

Student and other receivables consisted of the following as of June 30, 2021 and 2020 (in thousands):

	<u>2021</u>	<u>2020</u>
Government grants	\$ 1,356	2,343
Notes, loans, and other receivables	6,250	10,115
Student receivables	1,680	1,528
Accrued interest receivable	16	21
	<u>9,302</u>	<u>14,007</u>
Less allowance for doubtful accounts	<u>(938)</u>	<u>(779)</u>
	<u>\$ 8,364</u>	<u>13,228</u>

The University makes uncollateralized loans to students based on financial need. Student loans are funded through federal government loan programs or institutional resources.

At June 30, 2021 and 2020, student loans held by the University included in notes, loans, and other receivables above consisted of the following (in thousands):

	<u>2021</u>	<u>2020</u>
Federal government programs	\$ 2,806	3,620
Institutional programs	26	34
	<u>2,832</u>	<u>3,654</u>
Less allowance for doubtful accounts	<u>(3)</u>	<u>(3)</u>
	<u>\$ 2,829</u>	<u>3,651</u>

The University participates in the Federal Perkins Loan Program (the Program). The availability of funds for loans under the Program is dependent on reimbursements to the pool from repayments on outstanding loans. Funds advanced by the federal government of \$3,234,000 at June 30, 2021 and \$4,399,000 at June 30, 2020 are ultimately refundable to the government and are classified as liabilities in the consolidated balance sheet. Outstanding loans canceled under the Program result in a reduction of funds available for loan and a decrease in the liability to the government. At June 30, 2021 and 2020, no material amounts were past due under other student loan programs.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

Allowances for doubtful accounts are established based on prior collection experience and current economic factors, which, in management's judgment, could influence the ability of loan recipients to repay the amounts per the loan terms. Institutional loan balances are written off only when they are deemed to be permanently uncollectible. Amounts due under the Program are guaranteed by the government and, therefore, no reserves are placed on past due balances.

(5) Investments

Investments as of June 30, 2021 and 2020 are summarized as follows (in thousands):

	<u>2021</u>	<u>2020</u>
Pooled cash and cash equivalents	\$ 47,357	89,800
Certificate of deposit	—	7,729
Mutual funds	190,252	150,580
Equity holdings	56,203	35,410
Fixed income holdings	94,988	117,872
Commingled funds	160,736	119,282
Hedge funds	486,605	254,300
Private equity	139,031	101,903
Real assets	76,701	66,706
Venture capital	429,050	220,835
Real estate	37,837	33,836
Beneficial interest in funds held by others	9,604	7,539
Notes and other	3,012	3,074
Net pending trades	1,638	5,073
	<u>\$ 1,733,014</u>	<u>1,213,939</u>

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

The following tables summarize investment values by category of investment as of June 30, 2021 and 2020 (in thousands). Consistent with ASU 2015-07, investments measured at net asset value (NAV) are not classified in the fair value hierarchy:

	2021				Total fair value
	Investments measured at NAV	Investments classified in the fair value hierarchy			
		Level 1	Level 2	Level 3	
Pooled cash and cash equivalents	\$ —	47,357	—	—	47,357
Mutual funds:					
Bonds	—	69,777	—	—	69,777
Equity	—	95,106	—	—	95,106
International equity	—	21,605	—	—	21,605
Real estate	—	3,764	—	—	3,764
Equity holdings:					
Domestic	—	56,203	—	—	56,203
Fixed income holdings:					
Corporate bonds	—	—	79,547	—	79,547
U.S. treasury bonds	—	—	15,441	—	15,441
Commingled funds:					
International equity	147,618	—	—	—	147,618
Corporate bonds	13,118	—	—	—	13,118
Hedge funds:					
Equity	51,500	—	—	—	51,500
Distressed debt	27,408	—	—	—	27,408
Fund of funds	406,368	—	—	—	406,368
Global opportunistic	1,329	—	—	—	1,329
Private equity	139,006	—	—	25	139,031
Real assets	71,162	—	—	5,539	76,701
Venture capital	423,681	—	—	5,369	429,050
Real estate	—	—	37,837	—	37,837
Beneficial interest in funds held by others	9,604	—	—	—	9,604
Notes and other	—	962	—	2,050	3,012
Net pending trades	—	1,638	—	—	1,638
	<u>\$ 1,290,794</u>	<u>296,412</u>	<u>132,825</u>	<u>12,983</u>	<u>1,733,014</u>

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

	2020				Total fair value
	Investments measured at NAV	Investments classified in the fair value hierarchy			
		Level 1	Level 2	Level 3	
Pooled cash and cash equivalents	\$ —	89,800	—	—	89,800
Certificate of deposit	—	—	7,729	—	7,729
Mutual funds:					
Bonds	—	66,427	—	—	66,427
Equity	—	64,991	—	—	64,991
International equity	—	16,354	—	—	16,354
Real estate	—	2,808	—	—	2,808
Equity holdings:					
Domestic	—	35,410	—	—	35,410
Fixed income holdings:					
Corporate bonds	—	—	107,229	—	107,229
Municipal bonds	—	—	2,141	—	2,141
U.S. treasury bonds	—	—	8,502	—	8,502
Commingled funds:					
International equity	106,551	—	—	—	106,551
Corporate bonds	12,731	—	—	—	12,731
Hedge funds:					
Equity	23,679	—	—	—	23,679
Distressed debt	21,720	—	—	—	21,720
Fund of funds	207,618	—	—	—	207,618
Global opportunistic	1,283	—	—	—	1,283
Private equity	101,903	—	—	—	101,903
Real assets	61,293	—	—	5,413	66,706
Venture capital	215,538	—	—	5,297	220,835
Real estate	—	—	33,836	—	33,836
Beneficial interest in funds held by others	7,539	—	—	—	7,539
Notes and other	—	1,211	—	1,863	3,074
Net pending trades	—	5,073	—	—	5,073
	<u>\$ 759,855</u>	<u>282,074</u>	<u>159,437</u>	<u>12,573</u>	<u>1,213,939</u>

The following methods and assumptions were used to estimate the fair value for each class of financial instrument included in the fair value hierarchy:

Pooled cash and cash equivalents – Pooled cash and cash equivalents consist of cash and cash equivalents held in the investment pool for capital contributions, manager related fees and expenses, and funding of new investments. Inflows to cash and cash equivalents include investment activities from partner distributions, manager redemptions, and income received. Cash and cash equivalents are recorded at fair value using quoted market prices and are classified as Level 1.

Certificate of deposit – The fair value of certificate of deposits, which are derived from various sources and pricing matrices, are classified as Level 2.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

Mutual Funds – Mutual funds consist of several distinct funds with varying portfolio compositions and objectives. These investments are traded on an active exchange, are priced using unadjusted market quotes for identical assets, and are classified as Level 1.

Equity holdings – Investments in equity holdings are measured at fair value using quoted market prices. They are classified as Level 1 and are traded in an active market for which closing stock prices are readily available.

Fixed income holdings – Investments in fixed income holdings include corporate bonds, municipal bonds, and U.S. treasury bonds. Fixed income holdings are classified as Level 2 based on multiple sources of information, which may include market data and/or quoted market prices from either markets that are not active or are for similar assets in active markets.

Real estate – Investments in real estate include commercial and residential property holdings. Real estate investments are classified as Level 2 based on multiple sources of information such as appraisals and market comparables.

Net pending trades – Net pending trades consist of a) purchases made before year-end where the University has transferred cash to the fund manager but is not invested in the underlying fund until the next fiscal year, and b) withdrawals or distributions, where the investment has been sold but cash proceeds have not been received by the University at June 30. Net pending trades are recorded at fair value using quoted market prices and are classified as Level 1.

While the University believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different estimate of fair value at the reporting date.

There were no transfers between Level 1 and Level 2 investments, or between Level 2 and Level 3, for the years ended June 30, 2021 and 2020, for assets classified in the fair value hierarchy.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

The following table presents information for applicable investments regarding their funding commitments, redemption, and restrictions as of June 30, 2021 (in thousands):

	<u>Fair value</u>	<u>Unfunded commitments</u>	<u>Redemption frequency (if currently eligible)</u>	<u>Redemption notice period</u>
Commingled funds:				
International equity	\$ 147,618	—	weekly, monthly, n/a	6–10 days
Corporate bonds	13,118	—	monthly	6–7 days
Hedge funds:				
Equity	51,500	—	monthly, quarterly	10–90 days
Distressed debt	27,408	1,300	annually, quarterly, n/a	90 days
Fund of funds	406,368	—	monthly, annually	90–365 days
Global opportunistic	1,329	—	n/a	n/a
Private equity	139,031	61,894	see below	see below
Real assets	76,701	35,344	see below	see below
Venture capital	429,050	38,632	see below	see below
Beneficial interest in funds held by others	9,604	—	see below	see below
	<u>\$ 1,301,727</u>	<u>137,170</u>		

The University holds investments in private equity, real assets, and venture capital in the amounts of \$139,031,000, \$76,701,000, and \$429,050,000, respectively, which do not allow for periodic redemption, but rather distributions are received through the liquidation of the underlying assets. At June 30, 2021, they had estimated termination dates that range from 2021 to 2033. Additionally, within distressed debt hedge funds the University holds \$9,573,000 in closed-end funds with estimated termination date that range from 2021 to 2024 and \$6,764,000 in funds which currently have lockup period of three months. The global opportunistic hedge funds holding does not allow for periodic redemption. The University also holds beneficial interest in funds that are managed by others. These funds, per donor restriction, are to be held in perpetuity by the third party and can never be redeemed.

The following schedule summarizes investment returns during 2021 and 2020, presented in “Net return on operating investments” and “Net return on nonoperating long-term investments” in the consolidated statement of activities (in thousands):

	<u>2021</u>	<u>2020</u>
Interest, dividends and other income	\$ 16,891	16,108
Net realized gains	34,105	17,776
Net unrealized gains	493,601	16,590
Direct management fees and other	<u>(7,971)</u>	<u>(6,344)</u>
Net return on investments	<u>\$ 536,626</u>	<u>44,130</u>

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(6) Endowment

The University's endowment consists of approximately 920 individual funds established for a variety of purposes. Its endowment includes both donor-restricted endowment funds and funds designated by the governing board to function as endowments. Net assets associated with endowment funds, including funds designated by the governing board to function as endowments, are classified and reported based on the existence or absence of donor-imposed restrictions.

(a) Interpretation of Relevant Law

The University's governing board has interpreted UPMIFA enacted in the State of California as requiring the preservation of the fair value of the original gift as of the gift date of the donor-restricted endowment funds absent explicit donor stipulations to the contrary. As a result of this interpretation, the University classifies as net assets with donor restrictions (a) the original value of the gifts donated to the permanent endowment, and (b) the original value of subsequent gifts to the permanent endowment. Together, these amounts become the perpetual value of the funds. Net endowment return on investments that have not been appropriated for expenditure are classified as net assets with donor restrictions for time and/or purpose.

In accordance with UPMIFA, the University considers the following factors in making a determination to appropriate or accumulate donor-restricted endowment funds:

1. The duration and preservation of the fund
2. The purposes of the University and the donor-restricted endowment fund
3. General economic conditions
4. The possible effect of inflation and deflation
5. The expected total return from income and the appreciation of investments
6. Other resources of the University
7. The investment policies of the University

(b) Return Objectives and Risk Parameters

The University's governing board has adopted investment and spending policies for endowment assets that attempt to provide a predictable stream of funding to programs supported by its endowment while seeking to maintain the purchasing power of the endowment assets to create intergenerational equity. Endowment assets include those assets of donor-restricted funds that the University must hold in perpetuity or for a donor-specified period as well as board-designated funds.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(c) Strategies Employed for Achieving Objectives

To satisfy its long-term rate-of-return objectives, the University relies on a total return strategy in which investment returns are achieved through both capital appreciation (realized and unrealized) and current equities, fixed income, and alternative investments. Targeted asset allocation percentages for each of these components are reviewed periodically throughout the year for potential adjustment of asset mix while evaluating the relative risk of each component.

(d) Spending Policy

Endowment spending is determined using a weighted average calculation of two components. The first component is the prior year spending allocated for each endowment increased by an inflationary factor weighted by 40%. The second component is a 12-quarter rolling market value average times an established spending rate of 4.5% weighted by 60%. The combination of these two calculations is the endowment spending allocation. For the year ended June 30, 2021, the Board of Trustees approved a one-year increase in the spending rate from 4.5% to 5.75% from certain board-designated endowment funds due to the COVID-19 pandemic.

Changes in endowment net assets and net asset composition for the year ended June 30, 2021, not including contributions receivable of \$8,532,000, are as follows (in thousands):

	2021		
	Without donor restrictions	With donor restrictions	Total
Endowment net assets, June 30, 2020	\$ 182,056	852,111	1,034,167
Investment return:			
Investment income	3,524	10,794	14,318
Net realized and unrealized gain on investments	91,784	423,638	515,422
Total investment return	95,308	434,432	529,740
Contributions	152	12,251	12,403
Appropriation of endowment assets for expenditure	(6,438)	(33,649)	(40,087)
Other changes:			
Transfers to board-designated endowment funds	1,000	—	1,000
Maturity of annuities	—	419	419
Endowment net assets, June 30, 2021	\$ <u>272,078</u>	<u>1,265,564</u>	<u>1,537,642</u>
Composition of endowment net assets:			
Donor-restricted endowment funds	\$ —	1,265,564	1,265,564
Board-designated endowment funds	272,078	—	272,078
Total endowment net assets	\$ <u>272,078</u>	<u>1,265,564</u>	<u>1,537,642</u>

SANTA CLARA UNIVERSITY
Notes to Consolidated Financial Statements
June 30, 2021

Changes in endowment net assets and net asset composition for the year ended June 30, 2020, not including contributions receivable of \$7,840,000, are as follows (in thousands):

	2020		
	Without donor restrictions	With donor restrictions	Total
Endowment net assets, June 30, 2019	\$ 181,739	838,021	1,019,760
Investment return:			
Investment income	1,888	10,432	12,320
Net realized and unrealized gain on investments	2,319	25,380	27,699
Total investment return	4,207	35,812	40,019
Contributions	13	11,786	11,799
Appropriation of endowment assets for expenditure	(5,464)	(33,692)	(39,156)
Other changes:			
Transfers to board-designated endowment funds	1,550	(49)	1,501
Maturity of annuities	11	233	244
Endowment net assets, June 30, 2020	\$ 182,056	852,111	1,034,167
Composition of endowment net assets:			
Donor-restricted endowment funds	\$ —	852,111	852,111
Board-designated endowment funds	182,056	—	182,056
Total endowment net assets	\$ 182,056	852,111	1,034,167

(e) Funds with Deficiencies

From time to time, the fair value of assets associated with individual donor-restricted endowment funds may fall below the level that the donor or UPMIFA requires the University to retain as a fund of perpetual duration. For June 30, 2021 and June 30, 2020, there were no deficiencies of this nature.

SANTA CLARA UNIVERSITY
Notes to Consolidated Financial Statements
June 30, 2021

(7) Plant Assets

Plant assets as of June 30, 2021 and 2020 are as follows (in thousands):

	<u>2021</u>	<u>2020</u>
Land	\$ 83,032	83,589
Buildings	890,925	924,930
Improvements other than buildings	112,310	111,213
Equipment	148,010	146,089
Library books	61,378	63,691
	<u>1,295,655</u>	<u>1,329,512</u>
Accumulated depreciation and amortization	<u>(464,170)</u>	<u>(453,955)</u>
	831,485	875,557
Construction in progress	<u>218,318</u>	<u>148,546</u>
	<u>\$ 1,049,803</u>	<u>1,024,103</u>

(8) Bonds and Notes Payable

Bonds and notes payable as of June 30, 2021 and 2020 are as follows (in thousands):

	<u>2021</u>	<u>2020</u>
4% to 5% California Educational Facilities Authority (CEFA) Revenue Bonds Series 2017C maturing serially through April 1, 2037 and CEFA term bonds totaling \$29,760 maturing April 1, 2042, 2046 and 2048, secured by the full faith and credit of the University	\$ 52,485	52,485
2.475% to 5% CEFA Revenue Bonds Series 2017A&B maturing serially through April 1, 2037 and CEFA term bonds totaling \$73,930 maturing April 1, 2037, 2040, and 2047, secured by the full faith and credit of the University	122,565	122,565
3% to 5% CEFA Revenue Bonds Series 2015 maturing serially through April 1, 2036 and CEFA term bonds totaling \$54,440 maturing April 1, 2039 and 2045, secured by the full faith and credit of the University	95,530	97,870
3.5% to 5.25% CEFA Series 1999 bonds maturing serially through September 1, 2020 and CEFA term bonds totaling \$37,845 maturing September 1, 2023 and 2026, fully insured as to principal and interest, secured by the full faith and credit of the University	35,722	40,847

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

	<u>2021</u>	<u>2020</u>
1.94% Bank of America Revenue Bonds maturing serially through July 1, 2025, secured by the full faith and credit of the University	\$ 4,075	4,875
	310,377	318,642
Unamortized premium and bond issuance costs, net	24,630	24,549
	\$ <u>335,007</u>	<u>343,191</u>

The University's policy is to capitalize interest cost incurred on debt during the construction of major projects exceeding one year. During the years ended June 30, 2021 and 2020, \$6,419,000 and \$3,043,000 of interest was capitalized, respectively. For the years ended June 30, 2021 and 2020, total interest expense, net of amounts capitalized, was \$10,325,000 and \$13,660,000, respectively. During the years ended June 30, 2021 and 2020, \$3,152,000 and \$3,293,000, respectively, represents interest expense associated with the University's lease obligations.

The annual debt service requirements subsequent to June 30, 2021 are as follows (in thousands):

	<u>Principal maturities</u>	<u>Interest</u>	<u>Total</u>
Year ending June 30:			
2022	\$ 9,600	13,501	23,101
2023	12,434	13,090	25,524
2024	12,939	12,570	25,509
2025	13,469	12,015	25,484
2026	14,076	11,481	25,557
Thereafter	247,859	128,425	376,284
	310,377	191,082	501,459
Unamortized premium and bond issuance costs, net	24,630	—	24,630
	\$ <u>335,007</u>	<u>191,082</u>	<u>526,089</u>

The University has \$60,000,000 available under an unsecured revolving credit agreement that matures in September 2021. As of June 30, 2021 and 2020, no amounts were outstanding on lines of credit.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(9) Lease Liabilities

The following information applies to lease liabilities as of June 30, 2021:

On July 1, 2020, the date of adoption of ASC 842, the University had two existing leases. In September 2011, the University entered into a non-cancellable lease for a student residential housing facility. Two members of the University's Board of Trustees and their families have material financial interests in the entities that developed and are leasing the facility to the University. The lease term is for 234 months ending February 2031. At the end of the lease term, the University has two successive options to extend the lease for additional eight-year terms. The gross amount of buildings recorded under this finance lease was \$45,553,000, which is the present value of future lease payments, discounted using prevailing market rate of 8%. The net amount recorded as right of use assets under this lease at June 30, 2021 was \$22,582,000. The amortization expense for the lease is calculated on a straight-line basis over the useful life of 234 months included within the University's depreciation and amortization expense. This amount was \$2,336,000 for the year ended June 30, 2021.

In November 2014, the University entered into a noncancelable lease for commercial office building, which was remodeled to be used as office and classroom space. Two members of the University's Board of Trustees and their families have material financial interests in the entities that developed and are leasing the facility to the University. The lease term is for 234 months ending April 2034. At the end of the lease term, the University has two successive options to extend the lease for additional ten-year terms. The gross amount of buildings recorded under this finance lease was \$23,800,000, which is the present value of future lease payments, discounted using prevailing market rate of 5%. The net amount recorded as right of use under this lease at June 30, 2021 was \$15,798,000. The amortization expense for this lease is calculated on a straight-line basis over the useful life of 234 months and included within the University's depreciation and amortization expense. This amount was \$1,231,000 for the year ended June 30, 2021. Lease costs associated with these two leases was reported in the statement of activities as interest was \$3,153,000 and depreciation and amortization was \$2,760,000.

As a result of the adoption of ASC 842, the University made the new required lease disclosures for periods after the effective date, and carried forward ASC 840 disclosures for comparative periods.

Under ASC 842, the University has elected to not apply the recognition requirements to leases of less than twelve months. These leases are expensed on a straight-line basis and are not included within the University's lease asset or liability.

This standard does not have material impact on the University's results of operations or cash flows. Payments under the University's lease agreements are fixed for terms ranging from ten to twelve years.

SANTA CLARA UNIVERSITY
Notes to Consolidated Financial Statements
June 30, 2021

Maturities of lease liabilities under non-cancellable leases as of June 30, 2021 are as follows (in thousands):

	Finance leases
Year ending June 30:	
2022	\$ 5,986
2023	6,061
2024	6,137
2025	6,216
2026	6,298
Thereafter	41,364
Total undiscounted lease payments	72,062
Less imputed interest	(21,376)
Total lease liabilities	\$ 50,686

For June 30, 2020 under ASC 840, the University's future minimum capital lease payments for the same two leases were as follows (in thousands):

	Capital leases
Year ending June 30:	
2021	\$ 6,355
2022	5,986
2023	6,061
2024	6,137
2025	6,217
Thereafter	47,664
Total minimum lease payments	78,420
Less amount representing interest	24,529
Present value of net minimum capital lease payments	\$ 53,891

(10) Availability of Financial Assets for General Expenditures

Resources available to the University to fund general expenditures, such as operating expenses, scheduled principal and interest payments on bonds and leases, and capital construction costs have seasonal variations related to the timing of tuition payments, receipts of gifts and pledge payments, and transfers from the endowment. The University actively monitors liquidity required to meet general expenditures, while also maximizing the investment of funds in excess of daily requirements utilizing a combination of short and long-term operating investment strategies. In addition, management monitors the

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

timing and availability of its financial assets in order to align cash inflows with anticipated outflows. The University's financial assets are included in cash and cash equivalents, contributions receivable, student and other receivables, investments, and funds held in trust by others. At June 30, 2021, existing financial assets and liquidity resources available for general expenditures within one year were as follows (in thousands):

Financial assets:

Cash and cash equivalents	\$	49,315
Student and other receivables		3,052
Contributions receivable for operations and capital projects		5,612
Investments – operating		104,596
Investments – appropriated endowment spending payout		42,800
Funds held in trust by others		26
		<hr/>
Total financial assets available within one year		205,401

Liquidity resources:

Bank line of credit		60,000
		<hr/>
Total financial assets and liquid resources available within one year	\$	<u>265,401</u>

In addition to financial assets and liquid resources available to meet general expenditures over the next year, the University seeks to operate within a balanced budget and anticipates collecting sufficient revenue to cover general expenditures. Refer to the statements of cash flows, which identified the sources and uses of the University's cash generated by operating activities for the year ending June 30, 2021.

The University also has board-designated endowments of \$272,078,000 as of June 30, 2021. Although the University does not routinely spend from its board-designated endowment funds other than amounts appropriated for general expenditures, amounts from these endowments could be made available if deemed necessary and approved by the University Board of Trustees. However, both the board-designated and donor-restricted endowment funds contain investments that are subject to market fluctuations and have lock-up provisions that reduce the total that could be made available (see note 5 for disclosures pertaining to investments).

(11) Defined Contribution Plan

The University provides retirement benefits for eligible faculty, staff, and administrative employees through Internal Revenue Code (IRC), Section 401(a) and 403(b) plans. During 2021 and 2020, the University contributed approximately \$8,682,000 and \$15,888,000, respectively, to the defined contribution 401(a) retirement plan on behalf of its faculty, staff, and administrative employees. From September 2020 through June 2021, the rate of defined contributions was reduced as part of the University's cost containment initiatives implemented due to the COVID-19 pandemic. The University does not contribute to the 403(b) plan.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(12) Expenses by Natural and Functional Classification

The University's primary program activity is instruction, academic support and research. Facilities operation and maintenance, interest, and depreciation are allocated among functional classifications based on usage of space, square footage, building costs, and debt proceeds usage. Information technology costs are allocated based on software usage and the overall number of employees in the various functional categories. All other costs are charged directly to the appropriate functional category. Research expenses of \$5,276,000 and \$5,784,000 in 2021 and 2020, respectively, are included in instruction, academic support and research. Expenses associated with fundraising activities of the University were \$12,525,000 and \$15,857,000 in 2021 and 2020, respectively, are included in administrative support.

Expenses by natural and functional classification for the year ended June 30, 2021, were as follows (in thousands):

	Program activities				Supporting activities		Total
	Instruction, academic support and research	Public service	Student services	Auxiliaries	Administrative support	Facilities operation and maintenance	
Academic related salaries and wages	\$ 113,246	526	—	—	—	—	113,772
Nonacademic salaries and wages	—	6,490	23,532	2,124	26,413	8,179	66,738
Benefits expense	34,043	2,149	8,051	908	9,112	3,110	57,373
Professional fees and contracted services	9,409	2,431	1,924	2,643	6,334	7,278	30,019
General operating expenses	10,034	624	13,965	6,299	8,295	3,801	43,018
Allocated expenses:							
Interest expense	2,219	—	562	6,498	537	509	10,325
Depreciation expense	21,969	233	8,036	13,887	3,150	4,282	51,557
Facilities and maintenance of plant	14,739	119	6,776	2,338	3,187	(27,159)	—
Total expenses	\$ 205,659	12,572	62,846	34,697	57,028	—	372,802

Expenses by natural and functional classification for the year ended June 30, 2020, were as follows (in thousands):

	Program activities				Supporting activities		Total
	Instruction, academic support and research	Public service	Student services	Auxiliaries	Administrative support	Facilities operation and maintenance	
Academic related salaries and wages	\$ 115,075	689	—	—	—	—	115,764
Nonacademic salaries and wages	—	6,498	25,201	2,443	28,460	9,096	71,698
Benefits expense	37,898	2,503	9,267	1,074	9,890	3,600	64,232
Professional fees and contracted services	14,286	1,072	2,884	877	6,152	8,092	33,363
General operating expenses	13,600	2,683	16,542	9,450	11,888	2,196	56,359
Allocated expenses:							
Interest expense	5,776	—	341	6,563	522	458	13,660
Depreciation expense	23,001	143	7,095	13,345	3,169	4,325	51,078
Facilities and maintenance of plant	15,233	124	6,142	2,937	3,331	(27,767)	—
Total expenses	\$ 224,869	13,712	67,472	36,689	63,412	—	406,154

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(13) Income Taxes

The University is recognized by the Internal Revenue Service as an organization exempt from income taxes on related income under Section 501(c)(3) of the Internal Revenue Code and is also exempt under California Revenue and Taxation Code Section 23701d. However, the University is subject to income taxes on any net income that is derived from a trade or business, regularly carried on, and not in furtherance of the purpose for which it is granted exemption. The University receives some unrelated business income. Taxes on such income, if any, are not material to the University's consolidated financial statements.

(14) Related-Party Transactions and Amounts Held on Behalf of Others

The Jesuit Community is a separate entity and provides the University with teaching and administrative services. Compensation paid to the Jesuit Community for those services approximated \$2,621,000 and \$3,466,000 in 2021 and 2020, respectively, which is included in expenses in the accompanying consolidated statement of activities.

As of June 30, 2021 and 2020, \$18,050,000 and \$34,835,000, respectively, of gross contributions receivable are due from members of the Board of Trustees.

In fiscal year 2017 the University received a \$100,000,000 conditional pledge from a member of the University's Board of Trustees to support the construction of The Sobrato Campus for Discovery and Innovation. The first payment of \$25,000,000 was received during the year ended June 30, 2017. The second payment of \$25,000,000 was received during the year ended June 30, 2019. The third payment of \$25,000,000 was received during the year ended June 30, 2020. The fourth payment of \$12,500,000 was received during the year ended June 30, 2021. \$12,500,000 is conditional on the University securing a targeted amount of cash and or/written pledges from other donors and completing construction of The Sobrato Campus for Discovery and Innovation by specified dates. Due to its conditional nature, the \$12,500,000 pledge balance has not been recorded as a contribution receivable or contribution revenue.

During 2006, the University entered into an agreement with the Mission Cemetery, owned by the Jesuit Community, to participate in the University's investment activity by transferring cash into the University's endowment investment portfolio. The Mission Cemetery's investment at fair value is reflected in Amounts Held on Behalf of Others in the University's consolidated balance sheet. The fair value of the investment at June 30, 2021 is \$89,740,000. The University also holds \$2,215,000 in Amounts Held on Behalf of Others for the California Province of the Society of Jesus (CPSJ) Insurance Group of which it is a member and whose administrators are employees of the University. The remaining balance of \$201,000 as of June 30, 2021 in Amounts Held on Behalf of Others is held by the University on behalf of various other outside agencies.

As discussed in note 9, two members of the University's Board of Trustees and their families have material financial interests in the entities that developed and are leasing facilities to the University.

SANTA CLARA UNIVERSITY

Notes to Consolidated Financial Statements

June 30, 2021

(15) Commitments and Contingencies

As of June 30, 2021, the University has contractual obligations of approximately \$46,072,000 for completion of capital projects under construction. These obligations are expected to be payable over the next one and a half years and will be financed with debt proceeds, unexpended funds, and gifts. The University self-insures unemployment benefits. It is management's opinion that the amount provided in accrued expenses to cover expected claims is adequate.

The University is subject to audits for amounts received under federal government student financial aid awards and research grants from the federal government. Management believes such audits will not result in any material liabilities against the University.

The University is a defendant in various legal actions. While the outcome of these actions is not currently determinable, management is of the opinion that any uninsured liability from such actions will not have a material effect on the University's financial position.

(16) Subsequent Events

The University has evaluated subsequent events from the date of the consolidated statement of financial position through October 18, 2021, the date on which the consolidated financial statements were issued. There are no subsequent events that require disclosure.

(17) Financial Responsibility Standards

The University participates in Federal Title IV student financial assistance programs, which require it to meet standards of financial responsibility based on criteria determined by the U.S. Department of Education (ED), as set forth in 34 CFR 668.171. The criteria for private institutions includes the annual calculation by ED of a financial responsibility composite score, as further outlined in 34 CFR 668.172, using audited financial statements submitted through ED's eZ-Audit system. The composite score has been and will continue to be based on three ratios: Primary Reserve, Equity and Net Income.

SANTA CLARA UNIVERSITY

Supplementary Schedule of Financial Responsibility Data

As of and for the year ended June 30, 2021

(In thousands of dollars)

Location in financial statements or related notes	Financial element	Amount
Primary reserve ratio: Expendable net assets:		
Consolidated Balance Sheet	Net assets without donor restrictions	\$ 856,913
Consolidated Balance Sheet	Net assets with donor restrictions	1,512,442
Note 14, Related-Party Transactions and Amounts Held on Behalf of Others	Unsecured related party receivable	18,050
Consolidated Balance Sheet	Property, plant and equipment, net*	1,088,183
Note 7, Plant Assets	Construction in progress	218,318
Consolidated Balance Sheet	Bonds and notes payable	335,007
Consolidated Balance Sheet	Obligations under finance leases	50,686
	Debt obtained for long term purposes	385,693
Note 2, Net Assets	Net assets with donor restrictions for time and/or purpose- Annuity and life income funds	5,033
Note 2, Net Assets	Net assets with donor restrictions in perpetuity- Financial aid endowments	182,574
Note 2, Net Assets	Net assets with donor restrictions in perpetuity- Education and other program support endowments	113,146
Note 2, Net Assets	Net assets with donor restrictions in perpetuity- Academic chair endowments	59,583
Note 2, Net Assets	Net assets with donor restrictions in perpetuity- Pledges	8,532
Note 2, Net Assets	Net assets with donor restrictions in perpetuity- Annuity and life income funds	9,717
	Net assets with donor restrictions: restricted in perpetuity	373,552
Primary reserve ratio: Expenses and losses:		
Consolidated Statement of Activities	Total expenses	372,802
Consolidated Statement of Activities	Loss on disposal of assets	—
Consolidated Statement of Activities	Other changes, net	888
	Total expenses and losses without donor restrictions	373,690
Equity ratio: Modified net assets:		
Consolidated Balance Sheet	Net assets without donor restrictions	856,913
Consolidated Balance Sheet	Net assets with donor restrictions	1,512,442
Note 14, Related-Party Transactions and Amounts Held on Behalf of Others	Unsecured related party receivable	18,050
Equity ratio: Modified assets:		
Consolidated Balance Sheet	Total assets	2,960,154
Note 14, Related-Party Transactions and Amounts Held on Behalf of Others	Unsecured related party receivable	18,050
Net income ratio:		
Consolidated Statement of Activities	Change in net assets without donor restrictions	112,067
Consolidated Statement of Activities	Total operating revenues and other support	363,864
Consolidated Statement of Activities	Nonoperating Contributions	506
Consolidated Statement of Activities	Net return on nonoperating long-term investments	96,517
Consolidated Statement of Activities	Endowment appropriations used in operations	(40,087)
Consolidated Statement of Activities	Released contributions used in operations	(18,742)
Consolidated Statement of Activities	Net assets released from restrictions	83,438
	Total revenues and gains without donor restrictions	\$ 485,496

* Property, plant and equipment includes Right of use assets and Construction in progress

See accompanying independent auditors' report.



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

The President and Board of Trustees
Santa Clara University:

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the consolidated financial statements of Santa Clara University (the University), which comprise the consolidated balance sheet as of June 30, 2021, and the related consolidated statements of activities, and cash flows for the year then ended, and the related notes to the consolidated financial statements, and have issued our report thereon dated October 18, 2021, except as to Note 17, which is as of December 22, 2021.

Internal Control over Financial Reporting

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

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

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses.

Compliance and Other Matters

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



Purpose of this Report

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

KPMG LLP

Santa Clara, California

October 18, 2021, except
as to Note 17 to the financial
statements, which is as of December 22, 2021



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Santa Clara, CA 95054

Independent Auditors' Report on Compliance for Each Major Federal Program; Report on Internal Control over Compliance Required by the Uniform Guidance; and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

The President and Board of Trustees
Santa Clara University:

Report on Compliance for Each Major Federal Program

We have audited Santa Clara University's (the University) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the University's major federal programs for the year ended June 30, 2021. The University's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

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

Auditors' Responsibility

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

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

Opinion on Each Major Federal Program

In our opinion, Santa Clara University complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2021.

Report on Internal Control over Compliance

Management of the University is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the University's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance



for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the University's internal control over compliance.

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

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

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

Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the consolidated financial statements of Santa Clara University as of and for the year ended June 30, 2021, and have issued our report thereon dated October 18, 2021, except as to Note 17, which is as of December 22, 2021, which contained an unmodified opinion on those consolidated financial statements. Our audit was conducted for the purpose of forming an opinion on the consolidated financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the consolidated financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the consolidated financial statements as a whole.

KPMG LLP

Santa Clara, California
December 22, 2021

SANTA CLARA UNIVERSITY
Schedule of Expenditures of Federal Awards
Year ended June 30, 2021

Federal grantor/program title	Federal CFDA number	Pass-through entity identification number	Passed through to subrecipients	Total federal expenditures
Student Financial Assistance Cluster:				
Department of Education:				
Federal Supplemental Educational Opportunity Grants	84.007		\$ —	1,360,197
Federal Work-Study Program	84.033		—	240,026
Federal Perkins Loans	84.038		—	2,806,744
Federal Pell Grant Program	84.063		—	2,855,682
Federal Direct Student Loans	84.268		—	53,087,446
Teacher Education Assistance for College and Higher Education Grants	84.379		—	17,582
Total Student Financial Assistance Cluster			—	60,367,677
Research and Development:				
National Science Foundation Direct Program:				
Engineering Grants	47.041	1751861	—	190,477
Mathematical and Physical Sciences (Pass-Through Program)	47.049	DMR-1508278	—	209,101
Geosciences	47.050		—	30,570
Computer & Information Science & Engineering	47.070		—	59,316
Biological Sciences	47.074		—	50,467
Social, behavioral and Economic Sciences (Pass-Through Program)	47.075	BCS-1539795	—	114,377
Education and Human Resources	47.076	2040991	—	80,320
Total National Science Foundation Direct Program			—	734,628
National Science Foundation Pass-Through Program:				
Engineering Grants	47.071	10047899-SC	—	56,500
Biological Sciences	47.074	62479294-174520	—	1,080
Total National Science Foundation Pass-Through Program			—	57,580
U.S. Department of Commerce Direct Program:				
NIST- Verification of Stochastic Model for Cyber-Physical System Appliance Controller	11.609		—	19,553
Total U.S. Department of Commerce			—	19,553
U.S. Department of Defense Pass-Through Program:				
Office of Naval Research – Basic and Applied Scientific Research	12.300	N00014-20-1-2324	79,875	232,953
Office of Naval Research – Basic and Applied Scientific Research (Pass-through)	12.300	1810706/N00014-18-1-2169	—	665
Total U.S. Department of Defense			79,875	233,618
National Aeronautics and Space Administration (NASA)				
NASA –Wyle Laboratories(Pass-Through Program)	43.000	TXS0151748	—	216,481
Total National Aeronautics and Space Administration			—	216,481
U.S. Department Energy Pass-Through Program:				
Sandia National Lab	81.xxx	PO22596667	—	50
Total U.S. Department Energy			—	50
U.S. Department of Health and Human Services Direct Program:				
Environmental Health	93.113		—	64,738
Extramural Research Programs in the Neurosciences & Neurological Disorders	93.853		—	108,920
Allergy and Infections Diseases Research	93.855		—	83,889
Biomedical Research and Research Training	93.859		—	316,727
U.S. Department of Health and Human Services Pass-Through Program:				
University of Michigan- Trans-NIH Research Support	93.310	3004861348	—	4,386
University of Washington – Biomedical Research and Research Training	93.859	UWSC9678	—	46,041
Total U.S. Department of Health and Human Services			—	624,701
U.S. Patent and Trademark Office – IPA program				
USPTO – IPA Program (Pass-Through Program)	11.U01	20146001-0000-000	—	43,555
U.S. Agency for International Development Pass-Through Program:				
The Aspen Institute	98.001	7200AA19CA00016	50,100	69,940
Total Research and Development cluster			129,975	2,000,106
Other:				
U.S. Department of Justice Program:				
Capital Case Litigation Initiative (Pass-Through Program)	16.746	2019-FA-BX-0004	—	132,926
Postconviction Testing of DNA Evidence to Exonerate the Innocent (Pass-Through Program)	16.820		—	144,216
Victims of Human Trafficking-Community Solutions (Pass-Through Program)	16.U02	—	—	75,124
Total U.S. Department of Justice			—	352,266
National Endowment for the Humanities Direct Program:				
Promotion of the Humanities Public Programs	45.164		—	23,222
Total National Endowment for the Humanities			—	23,222

SANTA CLARA UNIVERSITY
Schedule of Expenditures of Federal Awards
Year ended June 30, 2021

<u>Federal grantor/program title</u>	<u>Federal CFDA number</u>	<u>Pass-through entity identification number</u>	<u>Passed through to subrecipients</u>	<u>Total federal expenditures</u>
U.S. Department of Education:				
COVID-19 – Higher Education Emergency Relief Fund-Student Aid Portion	82.425E		\$ —	2,771,093
COVID-19 – Higher Education Emergency Relief Fund-Institutional Aid Portion	82.425F		—	5,143,956
English Language Acquisition, Language Enhancement Program, & Academic Achievement (Pass-Through Program)	84.365Z	T365Z170070	232,371	396,917
Total Department of Education			<u>232,371</u>	<u>8,311,966</u>
Millennium Challenge Corporation:				
MCC Foreign Assistance for Overseas Programs	85.002	95332419T0017	—	68,910
U.S. Agency for International Development:				
Enclave Limited (Pass-Through Program)	98.U03	3867	—	18,297
Aga Khan Foundation (Pass-Through Program)	98.U04	CA-AP Sub#1	—	24,512
Total U.S. Agency for International Development			<u>—</u>	<u>42,809</u>
Total other			<u>232,371</u>	<u>8,799,173</u>
Total expenditures of federal awards			<u>\$ 362,346</u>	<u>71,166,956</u>

See accompanying notes to schedule of expenditures of federal awards.

SANTA CLARA UNIVERSITY

Notes to Schedule of Expenditures of Federal Awards

Year ended June 30, 2021

(1) Basis of Presentation

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal grant activity of Santa Clara University and affiliate (the University) and is presented on the accrual basis of accounting. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)*, for *Audits of States, Local Governments, and Nonprofit Organizations*.

(2) Student Financial Assistance Expenditures

Student financial assistance program expenditures include payments to students and each program's administrative allowance and exclude amounts representing cost sharing or matching. Administrative allowances totaling \$90,266 were claimed in the current year.

(3) Federal Student Loan Programs

The University had the following loan balances outstanding as of June 30, 2021. There were no Federal Perkins Loans expended during the year ended June 30, 2021.

Federal Perkins Loan Program	\$	3,619,152
------------------------------	----	-----------

(4) Indirect Cost Rates

The University has elected not to use the 10% de minimis indirect cost rate allowed under the Uniform Guidance. Facilities and administrative costs allocated to awards for the year ended June 30, 2021 were based on predetermined fixed rates up to 37% negotiated with the University's cognizant federal agency, the U.S. Department of Health and Human Services and are included as a component of the expenditures in the Schedule.

SANTA CLARA UNIVERSITY
 Schedule of Findings and Questioned Costs
 Year ended June 30, 2021

(1) Summary of Auditors' Results

- (a) Type of report issued on whether the financial statements were prepared in accordance with generally accepted accounting principles: **Unmodified**
- (b) Internal control deficiencies over financial reporting disclosed by the audit of the financial statements:
 - Material weaknesses: **No**
 - Significant deficiencies: **None Reported**
- (c) Noncompliance material to financial statements: **No**
- (d) Internal control deficiencies over major programs disclosed by the audit:
 - Material weaknesses: **No**
 - Significant deficiencies: **Yes**
- (e) Type of report issued on compliance for major programs: **Unmodified**
- (f) Audit findings that are required to be reported in accordance with 2 CFR 200.516(a): **Yes**
- (g) **Major Programs**

<u>CFDA number(s)</u>	<u>Name of federal program or cluster</u>
Various	Student Financial Assistance Cluster
84.425E and 84.425F	Education Stabilization Fund – COVID-19 – Higher Education Emergency Relief Funds

- (h) Dollar threshold used to distinguish between Type A and Type B programs: **\$750,000**
- (i) Auditee qualified as a low-risk auditee: **Yes**

(2) Findings Relating to the Financial Statements Reported in Accordance with *Government Auditing Standards*

None.

(3) Findings and Questioned Costs Relating to Federal Awards

None.



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**SANTA CLARA UNIVERSITY
SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS
FOR THE YEAR ENDED JUNE 30, 2021**

Finding 2020-001 Disbursement to or on Behalf of Students – Significant Deficiency in Internal Control and Instance of Noncompliance

Condition:

Per CFR Section 668.165 (a), before an institution disburses title IV, Higher Education Act (HEA) program funds for any award year, the institution must notify a student of the amount of funds that the student or his or her parent can expect to receive under each title IV, HEA program, and how and when those funds will be disbursed. If those funds include Direct Loan program funds, the notice must indicate which are from unsubsidized loans, and which are from Parent Loan for Undergraduate Students loans (PLUS). The institution must notify the student, or parent in writing of (1) the date and amount of the disbursement, and (2) the student's right, or parent's right to cancel all or a portion of that loan or loan disbursement and have the loan proceeds returned to the holder of that loan or the TEACH Grant payments returned to the Education Department; and (3) the procedure and time by which the student or parent must notify the institution that he or she wishes to cancel the loan, TEACH Grant, or TEACH Grant disbursement. Th School must make disbursement notification to the student or parent no earlier than 30 days before, and no later than 30 days after, crediting the student's account at the institution with Direct Loans, Federal Perkins Loans or TEACH grants. Institutions that do not implement an affirmative confirmation process must notify a student no earlier than 30 days before, but no later than 7 days after, crediting the student's account and must give the student 30 days (instead of 14) to cancel all or part of the loan.

Corrective Action Planned:

The University agrees with this assessment and has now implemented a new process to ensure disbursement notifications are tracked and maintained in each student file.

Status: Fully Corrected

The engagement team performed controls and compliance testwork over Disbursements. Based upon our testwork performed, this finding has been fully corrected as of and for the year ending June 30, 2021.