

FITCH RATES MASSACHUSETTS SBA'S \$300MM SUB SALES TAX BONDS 'AA+'; OUTLOOK STABLE

Fitch Ratings-New York-09 July 2019: Fitch Ratings has assigned a 'AA+' rating to the following Massachusetts School Building Authority (MSBA) subordinated sales tax bonds:

--\$300,000,000 subordinated dedicated sales tax bonds, 2019 series A.

The subordinated bonds are scheduled to be offered by negotiated sale on or about July 17, 2019.

Fitch has also affirmed the 'AAA' rating on \$5.1 billion in outstanding MSBA senior dedicated sales tax bonds, and the 'AA+' rating on \$875 million in outstanding MSBA subordinate dedicated sales tax bonds.

The Rating Outlook is Stable.

SECURITY

The authority's bonds are secured by an irrevocable dedication of one cent of Massachusetts's 6.25-cent sales tax, with some exclusions.

ANALYTICAL CONCLUSION

The ratings on the MSBA's dedicated sales tax revenue bonds are based on structural protections that insulate the bonds from the Commonwealth's general operations and on the strong growth prospects and resilience of dedicated sales tax revenues relative to Fitch's expectations for cyclicity. The insulation provided by these structural protections and the substantial cushion provided by the additional bonds test (ABTs) allow for ratings on the senior and subordinate liens that are linked to, but not capped by, the Commonwealth's 'AA+' Issuer Default Rating (IDR).

KEY RATING DRIVERS

STRONG GROWTH PROSPECTS: Performance of the dedicated sales tax securing the senior and subordinate lien bonds is strong and likely to remain so over time, reflecting the broad nature of the tax and the fundamental strength of the Commonwealth's economy.

SUBSTANTIAL CUSHION: Dedicated sales tax revenues have been subject to cyclicity, including a steep, three-year decline in the last recession, and Fitch expects future performance to be consistent with this history. The ABTs for both the senior and subordinate liens provide substantial cushion to ensure coverage of debt service, including under stress scenarios consistent with Fitch's tax supported criteria covering the impact of a moderate, national downturn and based on the highest consecutive historical revenue decline. This cushion is higher for the senior bonds, supporting the one notch rating distinction from the subordinate bonds.

STRONG STRUCTURAL PROTECTIONS: Revenues dedicated for school capital are segregated from the Commonwealth general fund, and the authority has no role in funding school operations. Strong legal covenants protect against diversion of revenues or lowering of the tax rate, although the base can be changed.

COMMONWEALTH CREDIT QUALITY: Massachusetts' 'AA+' IDR reflects its considerable economic resources, strong budget controls and a record of careful financial management. The Commonwealth carries a long-term liability burden that is well above average for a U.S. state but remains a moderate burden on resources.

RATING SENSITIVITIES

DEDICATED SALES TAX PERFORMANCE: The ratings are sensitive to expectations for strong performance of the dedicated sales tax revenue and continued solid debt service coverage levels.

COMMONWEALTH CREDIT QUALITY: The ratings are sensitive to changes in the Commonwealth's 'AA+' IDR, to which they are linked.

ECONOMIC RESOURCE BASE

Massachusetts has a fundamentally strong economy with strong growth prospects. Its dynamic, service-oriented economic profile includes numerous institutions of higher education and health care that lend stability, in addition to supporting development and innovation in other sectors. At 131% of the U.S. average in 2018, per capita personal income is the second highest of the states. Educational attainment is very high, and population growth has been strong during this decade, a shift from historical experience of slow population gains. Despite this shift, the Commonwealth's population profile remains older than the U.S. average, consistent with other states in the region.

Economic performance has been highly sensitive to national trends. In the most recent recession, Massachusetts performed significantly better than the national experience, in contrast to 2002-2004 when it suffered among the steepest employment drops in the country. Employment losses in the Great Recession were slightly less severe than those of the U.S. (down 6.0% in Massachusetts versus 6.3% for the U.S.). Employment growth since then has been consistently solid.

DEDICATED TAX CREDIT PROFILE

The Commonwealth has imposed a sales tax since 1966. Average annual sales tax growth has been about 6.6% since the inception of the tax, inclusive of rate and base changes. Since the one-cent tax pledge for MSBA was fully phased in, in fiscal 2011, dedicated sales tax performance has been strong. Actual YoY growth was 3.8% for fiscal 2018, preliminary growth was 4.0% in fiscal 2019 (which ended on June 30), and forecast growth is 4.0% for fiscal 2020.

Collections have also been economically sensitive, including a three-year, cumulative 7.9% dedicated sales tax decline in the last recession. Although performance of sales taxes in the last recession was weak, coverage of maximum annual debt service (MADS) remained solid. Additional bond issuance under the authority's \$10 billion authorization requires 1.4x maximum annual senior debt service coverage for senior bonds and 1.3x coverage of total MADS for subordinated bonds, providing a substantial cushion to ensure coverage relative to historical revenue cyclicity.

Including the new issue, fiscal 2019 preliminary revenues provide almost 2.4x coverage of MADS for the senior bonds, and more than 1.9x for senior and subordinate bonds, without consideration of the federal interest subsidies associated with Build America Bonds and Qualified School Construction Bonds.

Most, but not all, of the authority's bonds issued to date have a standard debt service reserve fund, although no reserve will be established for the current series. The debt service reserve level is not a rating factor for Fitch given the strong coverage and structural features of the bonds.

STRONG GROWTH PROSPECTS AND AMPLE COVERAGE UNDER FITCH SCENARIOS

Pledged sales tax receipts reflect the Commonwealth's fundamentally strong economic profile. Revenue growth has been solid since the last downturn. Consistent with Fitch's view of the Commonwealth's overall economic growth prospects, sales tax revenue growth prospects are likely to remain strong over time.

To evaluate the sensitivity of the dedicated revenue stream to cyclical decline, Fitch considers both revenue sensitivity results (using a 1% decline in national GDP scenario) and the largest actual decline in revenues over the period covered by the analysis. Based on a 20-year pledged revenue history, Fitch's analytical sensitivity tool (FAST) generated a 1.8% scenario decline in pledged revenues. The largest consecutive decline in this timeframe was 7.9%, based on recessionary losses during the fiscal 2008-2010 period.

Under both scenarios, dedicated revenue remains ample to ensure coverage of MADS. For senior bonds, the coverage cushion assuming issuance to the ABT equates to 16.1x the scenario decline and 3.7x the largest historical decline. On an aggregate basis including the bonds to be issued, the coverage cushion equates to slightly lower 12.8x the scenario decline and 2.9x the largest historical decline.

LIMITED EXPOSURE TO COMMONWEALTH OPERATIONS

Fitch views MSBA's dedicated sales tax bonds as having limited exposure to the operations of the Commonwealth. The one cent sales tax pledged to the bonds is segregated from the Commonwealth's general fund. Dedicated sales tax receipts are credited to the School Modernization and Reconstruction Trust (SMART) fund, which is held by the Commonwealth treasurer exclusively for the purposes of the authority, and disbursed to the bond trustee on a monthly basis. SMART fund revenues are not commingled with Commonwealth funds and are not subject to appropriation, and bondholders have first claim on the dedicated sales tax. The authorizing legislation specifies that the treasurer shall act as trustee as it relates to the SMART fund and not on account of the Commonwealth.

Dedicated taxes after payment of bonds remain with the MSBA. The authority can choose to transfer excess dedicated sales tax revenues to the Commonwealth, but the Commonwealth has relinquished all claims to the revenue. Strong statutory covenants protect against diversion of revenues or lowering of the dedicated tax rate, although the base can be changed. Dedicated tax revenues support school capital, with MSBA otherwise playing no role in funding school operations.

Given the insulation of dedicated revenues from general operations of the Commonwealth, bond security and the ratings on the senior and subordinate lien bonds are driven by sales tax performance and closely linked to overall economic performance. These structural protections and the substantial coverage cushion for the bonds allow for ratings that are linked to, but not capped by, the Commonwealth's 'AA+' IDR. However, based on Fitch's criteria for rating state dedicated tax bonds above the IDR, the amount of credit Fitch will give to such a structure is tempered by the risk that a state could exercise its sovereign powers to the detriment of bondholders.

The authority was created in 2004 to address a substantial backlog of programs funded under the Commonwealth's prior school building assistance program and create a sustainable system for school capital funding going forward. Pre-existing contract assistance commitments to localities, a declining obligation through 2024, are paid annually from dedicated revenues after payment of debt service. The authority was authorized to fund up to \$500 million in new projects annually starting in fiscal 2008 (with the limit adjusted up or down each year by the lesser of the dedicated sales tax revenue increase or decrease, or 4.5%); approval of new projects is contingent upon the availability of funds for this purpose. The authority does not have a waiting list. The authority consists of seven members: the Commonwealth Treasurer (chair), four treasurer appointments, and two ex-officio members.

CREDIT QUALITY OF MASSACHUSETTS

Massachusetts' 'AA+' IDR reflects its considerable economic resources, strong budget controls and a record of careful financial management. The Commonwealth carries a long-term liability burden

that is well above average for a U.S. state but remains a moderate burden on resources. The Stable Outlook reflects the expectation that the Commonwealth will continue to act as needed to ensure budget balance and maintain an adequate budgeted reserve position.

For more information on the Commonwealth, see Fitch Research 'Fitch Rates Massachusetts' \$700MM GO Bonds 'AA+'; Outlook Stable' dated April 17, 2019, available at www.fitchratings.com.

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Additional information is available on www.fitchratings.com

Applicable Criteria

U.S. Public Finance Tax-Supported Rating Criteria (pub. 03 Apr 2018)
<https://www.fitchratings.com/site/re/10024656>

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