

**Cash Management Improvement Act Agreement**  
**between**  
**The State of Washington**  
**and**  
**The Secretary of the Treasury,**  
**United States Department of the Treasury**

The Secretary of the Treasury, United States Department of the Treasury (hereafter 'Secretary'), and State of Washington (hereafter 'State'), in order to implement Section 5 of the Cash Management Improvement Act of 1990, as amended (hereafter 'Act'), agree as follows:

**1.0 AGENTS OF THE AGREEMENT**

1.1 The Authorized Official(s) for the State of Washington shall be the Assistant Director, Accounting Division, Office of Financial Management in all matters concerning this Agreement.

1.2 The Assistant Commissioner, Revenue Collections Management, Bureau of the Fiscal Service (Fiscal Service), U.S. Department of the Treasury, shall act as the Secretary's representative in all matters concerning this Agreement.

**2.0 AUTHORITY**

2.1 The authority for this Agreement is the Cash Management Improvement Act of 1990 (Public Law 101-453), as amended by the Cash Management Improvement Act of 1992 (Public Law 102-589), codified at 31 U.S.C. 6501 and 31 U.S.C. 6503.

2.2 The regulations codified at 31 CFR Part 205 shall apply to all matters pertaining to this Agreement, and are incorporated herein by reference. In the event of any inconsistency between this Agreement and 31 CFR Part 205, the regulations shall govern.

**3.0 DURATION, AMENDING, TERMINATING, AND MISCELLANEOUS PROVISIONS**

3.1 This Agreement shall take effect on 07/01/2022 and shall remain in effect until 06/30/2023.

3.2 This Agreement may be amended at any time by written, mutual consent of the State and the Fiscal Service. This Agreement shall be amended annually to incorporate new programs that qualify as major Federal assistance programs and remove programs that no longer qualify as major Federal assistance programs. A State must notify the Fiscal Service in writing within 30 days of the time the State becomes aware of a change that involves additions or deletions of programs subject to Subpart A, changes in funding techniques, and/or changes in clearance patterns. The notification must include a proposed amendment for review by the Fiscal Service.

3.3 Notwithstanding section 3.2, in the event of Federal or State non-compliance with Subpart B of 31 CFR, Part 205, the Fiscal Service may amend this Agreement at any time to incorporate additional programs and the entities that administer those programs.

3.4 This Agreement may be terminated by either party with 30 days written notice. If this Agreement is terminated, the Fiscal Service will prescribe the funding techniques, clearance patterns, and methods for calculating interest liabilities to be used by the State.

#### 4.0 PROGRAMS COVERED

4.1 The State's threshold and its major Federal assistance programs shall be determined based on the Schedule of Expenditures of Federal Awards for fiscal year ending 06/30/2021.

All major Federal assistance programs shall be covered by this Agreement, unless otherwise specified in section 4.4 of this Agreement.

4.2 The State's threshold for major Federal assistance programs is \$75,000,000.

The following programs meet or exceed the threshold and are not excluded in Section 4.4:

CFDA	Program Name
10.551	Supplemental Nutrition Assistance Program
10.557	Special Supplemental Nutrition Program for Women, Infants, and Children
10.559	Summer Food Service Program for Children
10.561	State Administrative Matching Grants for the Supplemental Nutrition Assistance Program
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs
17.225S	Unemployment Insurance -- State Benefit Account
20.205	Highway Planning and Construction
84.010	Title I Grants to Local Educational Agencies
84.027	Special Education -- Grants to States
84.425	Education Stabilization Fund
93.558	Temporary Assistance for Needy Families
93.563	Child Support Enforcement
93.575	Child Care and Development Block Grant
93.658	Foster Care -- Title IV-E
93.767	Children's Health Insurance Program
93.778	Medical Assistance Program
97.036	Disaster Grants - Public Assistance (Presidentially Declared Disasters)
97.050	Presidential Declared Disaster Assistance to Individuals and Households - Other Needs

4.3 The following programs fall below the State's threshold but have been required to be covered by Fiscal Service in accordance with the non-compliance provisions of Subpart B of 31 CFR Part 205:

There are currently no programs listed for Section 4.3.

4.4 The following programs exceed the State's threshold but have been excluded from coverage for the reason indicated:

CFDA	Program Name	Exclusion Reason
21.019	Coronavirus Relief Fund	Federal Statute - Full Exemption
84.063	Federal Pell Grant Program	Non-State
84.268	Federal Direct Student Loan	Non-State
93.268	Immunization Cooperative Agreements	Non-Cash
93.855	Allergy, Immunology and Transplantation Research	Non-State

#### 5.0 ENTITIES COVERED

5.1 State agencies and instrumentalities that meet the definition of a State per 31 CFR Part 205, shall be subject to the terms of this Agreement. The following is a list of such entities that administer funds under the programs listed in Section 4.0 of this Agreement:

Bond Retirement Interest  
 Department of Children, Youth, and Families  
 Department of Health  
 Department of Social & Health Services  
 Department of Transportation  
 Employment Security Department  
 Healthcare Authority  
 Military Department  
 Superintendent of Public Instruction

5.2 Entities that meet the definition of a Fiscal Agent per 31 CFR Part 205 shall be subject to the terms of this Agreement. The following is a list of Fiscal Agents that administer funds under the programs listed in the Section 4.0 of this Agreement:

Fiscal Agent	CFDA	Program Name
FIS (Fidelity National Information Svcs, LLC)	10.551	Supplemental Nutrition Assistance Program
Wells Fargo	10.557	Special Supplemental Nutrition Program for Women, Infants, and Children

## 6.0 FUNDING TECHNIQUES

### 6.1 General Terms

6.1.1 The State shall request Federal funds in accordance with the appropriate cut-off times shown in Exhibit I to ensure funds will be received and credited to a State account by the times specified in the funding techniques. Exhibit I is incorporated by reference herein.

6.1.2 The State shall schedule the receipt of Federal funds such that the funds are received and credited to a State account in accordance with the clearance patterns specified in Exhibit II - List of State Clearance Patterns. Exhibit II is incorporated by reference herein.

6.1.3 In instances where the receipt of funds is scheduled for a Saturday, the State shall request funds for deposit on Friday. In instances where the receipt of funds is scheduled for a Sunday, the State shall request funds for deposit on Monday. In instances where the receipt of Federal funds is scheduled for deposit on a day when the State is not open for business, the State shall request funds for deposit the day following the scheduled day; in instances where the receipt of Federal funds is scheduled for deposit on a day when the Federal Government is not open for business, the State shall request funds for deposit the day prior to the scheduled day.

#### 6.1.4 Estimates and Reconciliation of Estimates:

Where estimated expenditures are used to determine the amount of the drawdown, the State will indicate in the terms of the State unique funding technique how the estimated amount is determined and when and how the State will reconcile the difference between the estimate and the State's actual expenditures.

#### 6.1.5 Supplemental Funding:

Unless otherwise defined by program rules, Supplemental Funding is the award of additional funds to provide for an increase in costs due to unforeseen circumstances.

The State will comply with all Federal program agency policies and procedures for requesting supplemental grant funding.

The State will comply with the following guidelines when requesting supplemental funding for the Medical Assistance Program and associated administrative payments (CFDA 93.778):

The State must submit a revised Medicaid Program Budget Report (CMS-37) to request supplemental funding. The CMS guidelines and instructions for completing the CMS-37 are provided in Section 2600F of the State Medicaid Manual (SMM). The CMS/CO must

receive the revised Form CMS-37 through the Medicaid Budget Expenditure System/Children's Budget Expenditure System (MBES/CBES) no later than 10 calendar days before the end of the quarter for which the supplemental grant award is being requested.

Additional guidance on this policy is available from the respective CMS Regional Office, U.S. Department of Health & Human Services.

The State will comply with the following guidelines when requesting supplemental funding for TANF (CFDA 93.558), CCDF (CFDA 93.575), CSE (93.563), and the FC/AA (CFDA 93.658 and CFDA 93.659) programs administered by the U.S. Department of Human Services, Administration for Children and Families (HHS/ACF):

a. Timing of the Request

A State should initiate its request for supplemental funding during a quarter as soon as it becomes aware of the fact that a shortfall does/will exist. For the TANF and CCDF grants, supplemental funding requests (estimates) may be submitted by a State, for consideration by ACF, up through and including the 15th day of the third month of the first, second or third quarter of any fiscal year. Since TANF and CCDF are block grant programs, all unawarded portions of the annual allotment will automatically be issued at the beginning of the fourth quarter. Therefore, supplemental funding requests will not be available during the fourth quarter for these programs. For the CSE and FC/AA programs, supplemental funding requests may be submitted by a state, for consideration by ACF, up through and including the 15th day of the third month of any quarter of a fiscal year.

b. Justification for the Request

The request for a supplemental funding for any of the above-mentioned programs should contain a justification clearly documenting the need for the additional funding authority during the current quarter. This documentation should be in the form of State accounting records or similar documents that will show the actual expenditures through the most recent month for which such data are available, as well as the State's most accurate projection of its anticipated expenditures during the remaining month(s) of the quarter. For either the TANF or the CCDF program, the State's justification should also include an explanation of the activities requiring the obligation and/or expenditure of amounts that exceed the normal quarterly grant award restrictions and why these activities could not have been delayed until the next quarter.

c. Form Submittal

Supplemental funding requests should be made by completing the appropriate ACF quarterly report of expenditures and estimates applicable to the particular program for which the grant award request is being made.

d. Approval Process

Upon receipt of the state's request for additional funding authority for a quarter, the ACF Regional Office will promptly review the supporting documentation. If the request is properly justified, so long as ACF has adequate funding availability, the State's request will be expedited and supplemental funding will be issued within 5 days of ACF receiving the request. The State will be notified by the Regional Office when the supplemental award has been transmitted to the Payment Management System (PMS) and when it may initiate drawdowns against the supplemental funding.

Additional guidance on this policy is provided in the U.S. Department of Health & Human Services, Administration for Children and Families, letter (May 19, 2004) to State Administrators from the Deputy Assistant Secretary for Administration.

6.2 Description of Funding Techniques

6.2.1 The following are terms under which standard funding techniques shall be implemented for all transfers of funds to which the funding technique is applied in section 6.3.2 of this Agreement.

Funding Technique Name	Description
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Actual Clearance, ZBA - Same Day Payment	The State shall request funds the same day it pays out funds, in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. A Federal agency will deposit funds in a State account the same day as requested. The amount of the request shall be for the amount of funds that clear the State's account that day. This funding technique is interest neutral.
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6.2.2 The following are terms under which funding techniques for administrative costs shall be implemented for all transfers of funds to which the funding technique is applied in section 6.3.2 of this Agreement.

There are currently no funding techniques listed in Section 6.2.2.

6.2.3 The following are terms under which miscellaneous funding techniques shall be implemented for all transfers of funds to which the funding technique is applied in section 6.3.2 of this Agreement.

There are currently no funding techniques listed in Section 6.2.3.

6.2.4 The following are terms under which State unique funding techniques shall be implemented for all transfers of funds to which the funding technique is applied in section 6.3.2 of this Agreement.

Funding Technique Name	Description
Direct Funding WSDOT	The State shall request funds only after related cash expenditures have been recorded in TRAINS. Because the process is an automatic one, we expect reimbursement the same day wire requests are made. The amount of the request shall be the actual sum of cash expenditures that have been incurred, recorded, identified, and reconciled as billable from the preceding week. This funding technique is interest neutral.
Modified Administrative Costs - Annual	Administrative costs will be drawn on an annual basis for disaster recovery projects administered by the Washington Military Department. The draw request will be made in accordance with the cut-off times as shown in Exhibit I. Funds requested will be an accumulation of the administrative costs since the last draw. This funding technique is interest neutral.
Modified Direct Program and Admin Costs - Monthly	The state draws funds after the close of the fiscal month for direct program and indirect administrative costs. The draw request will be made in accordance with the cut-off time in Exhibit I. The funds drawn will be the accumulation of costs since the last draw. This funding technique is interest neutral.
Modified Direct Program Costs	Except for managed care payments, the State shall request funds for direct program costs to providers and clients. The draw will occur on fixed intervals. Managed care payments will have a separate draw. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. Managed care payments will be drawn the day before the payment to providers, so funds are received on date of managed care payments. The amount of the draw will be an accumulation of program costs since the last draw. This funding technique is interest neutral.
Modified Direct Program Costs - Admin, Payroll, Payments to Providers	The State shall request funds for all direct administrative costs and/or payroll costs, and/or payments made to providers and to support providers. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the funds requested shall be based on the amount of expenditures recorded for direct administrative costs and/or payroll costs and/or payments made to providers or to support providers since the last request for funds. The State payroll cycle is payday twice a month. Draws made the day before payday are for deposit on payday. The draw request will be made in accordance with the cut-off time in Exhibit I. The amount of the funds requested shall be based on the amount of expenditures recorded for direct administrative costs and/or payroll costs and/or payments made to providers or to support providers since the last request for funds. This funding technique is interest neutral.
Modified Direct Program/Benefit Costs - (ACH Drawdowns at Fixed Intervals - SPI)	The State shall request funds for all direct program/benefit payments to Providers. The request shall be made such that the funds are deposited to the State's account on the last working day of the month. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the funds requested shall be based on the amount of expenditures recorded for the direct

	program/benefit payments to Providers since the last request for funds. This funding technique is interest neutral.
Modified Pre-Issuance (Post-Issuance) (Fedwire Same Day Payment)	The State shall request funds daily from the Unemployment Insurance Trust Fund to pay for State unemployment insurance benefits. The State shall request funds such that they are deposited into the state account after the state issues checks, but before the checks clear. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. A federal agency shall deposit funds in the State account the same day as requested. The amount of the request shall be based on the amount of the actual warrants disbursed except in the case of a holiday following a day upon which checks are issued. This funding technique is interest neutral.
Pre-Issuance Grant Anticipation Revenue Vehicle (GARVEE) Bond Repayment	The State of Washington Department of Transportation will request funds for the repayment of GARVEE Bonds issued and paid by the Bond Retirement Interest Agency. Funds will be requested for payments of principal and interest on bonds. Funds may be requested at least seven business days in advance of the bond payment. This early drawdown has been approved by the Federal Highway Administration (FHWA) and Fiscal Service. This funding technique is interest neutral.
UI Admin - Modified Payment Schedule (Fedwire Semi-Monthly Drawdown on Payday)	The State shall request funds semi-monthly. It issues Electronic Funds Transfer (EFT) payments and Voucher payments for Administrative and Reed Act costs including payroll. The State shall request funds semi-monthly. Warrants for Administrative and Reed Act Costs including payroll are disbursed from the State's account. The State's request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. A federal agency shall deposit funds in the State account the same day as requested, if the request is made in accordance with the appropriate Federal agency cut-off time specified in Exhibit 1. The amount of the request shall be the amount of EFT payments and Journal Voucher payments for Administrative and Reed Act costs including payroll that are issued from the State's account and the amount of Warrants for Administrative and Reed Act costs including payroll that are disbursed from the State's account. This funding technique is interest neutral.
UI Federal (Fedwire Same Day Payment Modified Actual Clearance ZBA)	The State shall request funds daily, or weekly for COVID-19 related draws, from the Unemployment Insurance Trust Fund to pay for Federal unemployment insurance benefits. The State shall request funds the same day it pays out funds (based upon actual settlement from the bank for both checks and warrants), in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. A federal agency shall deposit funds in the State account the same day as requested. The amount of the request shall be based on the amount of the actual warrants redeemed and checks cleared on that day in the State's account. This funding technique is interest neutral.

### 6.3 Application of Funding Techniques to Programs

6.3.1 The State shall apply the following funding techniques when requesting Federal funds for the component cash flows of the programs listed in sections 4.2 and 4.3 of this Agreement.

#### 6.3.2 Programs

Below are programs listed in Section 4.2 and Section 4.3.

10.551 Supplemental Nutrition Assistance Program  
 Recipient: Department of Social & Health Services  
 % of Funds Agency Receives: 100  
 Component: Direct Wire Settlement to Electronic Benefit (EBT)  
 system contractor or by Electronic Funds Transfer (EFT)  
 Technique: Actual Clearance, ZBA - Same Day Payment  
 Average Day of Clearance: 0 Days

10.557 Special Supplemental Nutrition Program for Women, Infants,  
 and Children  
 Recipient: Department of Health  
 % of Funds Agency Receives: 66  
 Component: Direct program/benefit payments for food voucher  
 redemption. Rebates offset the direct program/benefit payments. This is

a zero balance account.

Technique: Modified Direct Program Costs

Average Day of Clearance: 0 Days

10.557 Special Supplemental Nutrition Program for Women, Infants, and Children

Recipient: Department of Health

% of Funds Agency Receives: 34

Component: Administrative costs including payroll - salary, benefits, contractual and related expenditures

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

10.559 Summer Food Service Program for Children

Recipient: Superintendent of Public Instruction

% of Funds Agency Receives: 100

Component: Payments - reimbursements to school districts, private schools, child & adult care programs

Technique: Modified Direct Program/Benefit Costs - (ACH

Drawdowns at Fixed Intervals - SPI)

Average Day of Clearance: 0 Days

10.561 State Administrative Matching Grants for the Supplemental Nutrition Assistance Program

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 100

Component: Direct Wire Settlement to Electronic Benefit (EBT) system contractor or by Electronic Funds Transfer (EFT)

Technique: Actual Clearance, ZBA - Same Day Payment

Average Day of Clearance: 0 Days

17.225F Unemployment Insurance -- Federal Benefit Account and Administrative Costs

Recipient: Employment Security Department

% of Funds Agency Receives: 76

Component: Benefit Payments - Federal

Technique: UI Federal (Fedwire Same Day Payment Modified Actual Clearance ZBA)

Average Day of Clearance: 0 Days

17.225F Unemployment Insurance -- Federal Benefit Account and Administrative Costs

Recipient: Employment Security Department

% of Funds Agency Receives: 24

Component: Unemployment Insurance Administrative

Technique: UI Admin - Modified Payment Schedule (Fedwire Semi-Monthly Drawdown on Payday)

Average Day of Clearance: 0 Days

17.225S Unemployment Insurance -- State Benefit Account

Recipient: Employment Security Department

% of Funds Agency Receives: 100

Component: Benefit payments - State

Technique: Modified Pre-Issuance (Post-Issuance) (Fedwire Same Day Payment)

Average Day of Clearance: 0 Days

20.205 Highway Planning and Construction

Recipient: Bond Retirement Interest

% of Funds Agency Receives: 13.24

Component: Debt service  
Technique: Pre-Issuance Grant Anticipation Revenue Vehicle  
(GARVEE) Bond Repayment  
Average Day of Clearance: N/A

20.205 Highway Planning and Construction  
Recipient: Department of Transportation  
% of Funds Agency Receives: 86.76  
Component: Contractor payments, payroll, administrative and other  
program costs  
Technique: Direct Funding WSDOT  
Average Day of Clearance: 1 Day

84.010 Title I Grants to Local Educational Agencies  
Recipient: Superintendent of Public Instruction  
% of Funds Agency Receives: 5  
Component: Administrative costs including payroll  
Technique: Modified Direct Program Costs - Admin, Payroll, Payments  
to Providers  
Average Day of Clearance: 1 Day

84.010 Title I Grants to Local Educational Agencies  
Recipient: Superintendent of Public Instruction  
% of Funds Agency Receives: 95  
Component: Direct program/benefit payments to school districts, non-  
profits, service providers, and local educational agencies (LEA)  
Technique: Modified Direct Program/Benefit Costs - (ACH  
Drawdowns at Fixed Intervals - SPI)  
Average Day of Clearance: 1 Day

84.027 Special Education -- Grants to States  
Recipient: Superintendent of Public Instruction  
% of Funds Agency Receives: 95  
Component: Direct Program/Benefit payments to public or private  
schools and service providers  
Technique: Modified Direct Program/Benefit Costs - (ACH  
Drawdowns at Fixed Intervals - SPI)  
Average Day of Clearance: N/A

84.027 Special Education -- Grants to States  
Recipient: Superintendent of Public Instruction  
% of Funds Agency Receives: 5  
Component: Administrative costs including payroll  
Technique: Modified Direct Program Costs - Admin, Payroll, Payments  
to Providers  
Average Day of Clearance: 0 Days

84.425 Education Stabilization Fund  
Recipient: Superintendent of Public Instruction  
% of Funds Agency Receives: 10  
Component: SEA Reserve  
Technique: Modified Direct Program Costs - Admin, Payroll, Payments  
to Providers  
Average Day of Clearance: 0 Days

84.425 Education Stabilization Fund  
Recipient: Superintendent of Public Instruction  
% of Funds Agency Receives: 90  
Component: Direct program/payments to school districts, non-profits,  
service providers, and local educational agencies (LEA)  
Technique: Modified Direct Program/Benefit Costs - (ACH



Drawdowns at Fixed Intervals - SPI)

Average Day of Clearance: 0 Days

93.558 Temporary Assistance for Needy Families

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 83.67

Component: Direct Assistance to clients via the Electronic Benefit Transfer (EBT) system or by Electronic Funds Transfer (EFT) & One-Time Benefit Payments

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

93.558 Temporary Assistance for Needy Families

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 16.33

Component: Administrative costs including payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

93.563 Child Support Enforcement

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 100

Component: Administrative costs including payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

93.575 Child Care and Development Block Grant

Recipient: Department of Children, Youth, and Families

% of Funds Agency Receives: 5

Component: Administrative costs

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: N/A

93.575 Child Care and Development Block Grant

Recipient: Department of Children, Youth, and Families

% of Funds Agency Receives: 55.82

Component: Direct program costs, admin, and payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: N/A

93.575 Child Care and Development Block Grant

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 39.18

Component: Direct payments to providers for EFT and non-EFT payments

Technique: Modified Direct Program Costs

Average Day of Clearance: 0 Days

93.658 Foster Care -- Title IV-E

Recipient: Department of Children, Youth, and Families

% of Funds Agency Receives: 100

Component: Direct program costs, admin, and payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: N/A

93.767 Children's Health Insurance Program

Recipient: Healthcare Authority

% of Funds Agency Receives: 97.06

Component: Direct payments to providers for EFT and non-EFT payments

Technique: Modified Direct Program Costs

Average Day of Clearance: 0 Days

93.767 Children's Health Insurance Program

Recipient: Healthcare Authority

% of Funds Agency Receives: 2.94

Component: Admin and Payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

93.778 Medical Assistance Program

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 3.66

Component: Administrative costs including payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

93.778 Medical Assistance Program

Recipient: Department of Children, Youth, and Families

% of Funds Agency Receives: .28

Component: Direct payments to providers for EFT and non-EFT payments

Technique: Modified Direct Program Costs

Average Day of Clearance: 0 Days

93.778 Medical Assistance Program

Recipient: Healthcare Authority

% of Funds Agency Receives: 66.12

Component: Direct payments to providers for EFT and non-EFT payments

Technique: Modified Direct Program Costs

Average Day of Clearance: 0 Days

93.778 Medical Assistance Program

Recipient: Department of Social & Health Services

% of Funds Agency Receives: 27.47

Component: Direct payment to providers for EFT and non-EFT payments

Technique: Modified Direct Program Costs

Average Day of Clearance: 0 Days

93.778 Medical Assistance Program

Recipient: Healthcare Authority

% of Funds Agency Receives: 2.47

Component: Administrative costs including payroll

Technique: Modified Direct Program Costs - Admin, Payroll, Payments to Providers

Average Day of Clearance: 0 Days

97.036 Disaster Grants - Public Assistance (Presidentially Declared Disasters)

Recipient: Military Department

% of Funds Agency Receives: 7

Component: Admin costs

Technique: Modified Administrative Costs - Annual  
Average Day of Clearance: N/A

97.036 Disaster Grants - Public Assistance (Presidentially Declared Disasters)  
Recipient: Military Department  
% of Funds Agency Receives: 93  
Component: Direct program costs  
Technique: Modified Direct Program and Admin Costs - Monthly  
Average Day of Clearance: N/A

97.050 Presidential Declared Disaster Assistance to Individuals and Households - Other Needs  
Recipient: Employment Security Department  
% of Funds Agency Receives: 100  
Component: Lost wages assistance  
Technique: UI Federal (Fedwire Same Day Payment Modified Actual Clearance ZBA)  
Average Day of Clearance: 0 Days

### 6.3.3 Materiality Exemptions

Agencies exempt from coverage on the basis of materiality:

There are currently no agencies exempt from coverage on the basis of materiality.

## 7.0 CLEARANCE PATTERNS

7.1 The State shall develop separate clearance patterns for each of the following:

With the exception of programs administered by recipient Agency 350, Superintendent of Public Instruction, where all federal program payroll charges are based on 100% EFT payroll, the State shall develop a clearance pattern for the payroll and administrative function. This clearance pattern shall be applied to the payroll and administrative components of all programs.

7.2 The following shall develop the State's clearance patterns:

The Office of Financial Management, in conjunction with the Office of the State Treasurer (OST) and the applicable agency, shall develop all of the State's clearance patterns.

7.3 The sources of data the State shall use when developing its clearance patterns are as follows:

Type of Clearance Pattern: Payroll and Administrative; Source of Data: Human Resource Management System (HRMS) and OST's EFT and warrant redemption records. Type of Clearance Pattern: Program specific; Source of Data: Agency warrant registers and OST's warrant redemption records. For CFDA 20.205, the agency system is TRAINS.

7.4 The State shall use the following methodology when developing its clearance patterns:

When developing each clearance pattern, the State shall track at least 99% of the funds disbursed, from issuance to clearance, for a period of at least three months.

7.5 The State shall identify for each check or warrant (hereafter, check) in the population: (1) the date the check was released for payment; (2) the date the check was debited from the State's account, and, (3) the amount of the check.

7.6 The State shall use the following method to calculate the dollar-weighted average day of clearance:

To determine the number of days each check was outstanding (clearance time), the issue date shall be subtracted from the date the check cleared the State's account.

To determine the percentage of the disbursement paid out each day following issuance, the amount of the checks that clear the State's account each day shall be summed and then divided by the amount of the total disbursement.

For each day following issuance, the clearance time of the checks paid out that day shall be multiplied by the percentage of the total disbursement those checks represent. This product is the clearance factor.

The dollar-weighted average day of clearance for the disbursement shall be determined by summing the clearance factor of each day following the disbursement.

7.7 The State shall adjust each clearance pattern to reflect the dollar-weighted proportion of funds paid out by EFT/Direct payroll, with the following exceptions:

For most programs, the State distinguishes the payroll clearance from the recipient/benefit payments as a separate cash flow. However, in Agency 300, composite rate payroll clearance patterns are included in the agency's composite rate. Both the warrant clearance and the EFT payroll are considered in calculating the composite rate.

The State shall also adjust each clearance pattern to reflect:

None. Not applicable.

7.8 Each of the State's clearance patterns is calculated in Calendar days.

7.9 An authorized State official shall certify that each clearance pattern developed by the State accurately corresponds to the clearance activity of the programs to which it is applied. This certification shall be provided to the Fiscal Service prior to the effective date of the Agreement. The State shall recertify its clearance patterns at least every five years.

7.10 The State shall follow the procedures of 31 CFR 205 if it has actual or constructive knowledge, at any time, that a clearance pattern does not correspond to a program's clearance activity.

7.11.0 Program Specific- The State shall develop program-specific clearance patterns for each of the following programs: CFDA 20.205, Highway Planning and Construction; CFDA 10.551 Supplemental Nutrition Assistance Program, CFDA 10.557, Special Supplemental Nutrition Program for Women, Infants, and Children, CFDA 84.010 Title I Grants to Local Education Agencies, and CFDA 93.778 Medical Assistance Program.

7.12.0 Actual Activity - Non-Payroll. The State shall track 100 percent of the funds disbursed during a time period of at least three consecutive months. The State shall carry out the clearance pattern until at least 99 percent of the funds have cleared. This methodology shall be applied for all clearance patterns except payroll.

7.12.1 Actual Activity - Payroll. The State shall track the payroll funds disbursed by warrant during the time period of at least three consecutive months. The State shall adjust the warrant clearance pattern to reflect the percentage of payroll direct deposits applicable to each federal program. The composite clearance pattern for payroll warrants and direct deposit shall be carried out until at least 99 percent of payroll funds have cleared. The clearance pattern shall be based on 100% of the data, or on a sample size sufficient to ensure, at a minimum, a 95% confidence interval no wider than + or - 0.25 weighted-days about the estimated mean.

7.13.0 Clearance patterns were completed for Payroll (Average Clearance = 0 day), CFDA 20.205 Highway Planning and Construction (Average Clearance = 1 days), CFDA 10.551 Supplemental Nutrition Assistance Program, (Average Clearance = 1 days), CFDA 10.557 Special Supplemental Nutrition Program for Women, Infants, and Children, ( Average Clearance = 0 days), CFDA 84.010 Title I Grants to Local Education Agencies, (Average Clearance = 1 days), and CFDA 93.778 Medical Assistance Program (Average Clearance = 0 days) and submitted with the June 30, 2018, amendment. The clearance patterns were certified as to accuracy by the State of Washington, in compliance with Fiscal Service CMIA.

## 8.0 INTEREST CALCULATION METHODOLOGY

### 8.1 General Terms

8.1.1 The State and the Secretary agree that no interest liabilities will be incurred for transfers of funds made in accordance with the procedures specified in section 6 of this Agreement where the following funding techniques are applied:

Actual Clearance, ZBA - Same Day Payment  
Direct Funding WSDOT  
Modified Administrative Costs - Annual  
Modified Direct Program and Admin Costs - Monthly  
Modified Direct Program Costs  
Modified Direct Program Costs - Admin, Payroll, Payments to Providers  
Modified Direct Program/Benefit Costs - (ACH Drawdowns at Fixed Intervals - SPI)  
Modified Pre-Issuance (Post-Issuance) (Fedwire Same Day Payment)  
Pre-Issuance Grant Anticipation Revenue Vehicle (GARVEE) Bond Repayment  
UI Admin - Modified Payment Schedule (Fedwire Semi-Monthly Drawdown on Payday)  
UI Federal (Fedwire Same Day Payment Modified Actual Clearance ZBA)

8.1.2 The State shall maintain information on disbursements and receipts of funds to verify the implementation of any funding technique and document interest liabilities.

For each disbursement, the State shall be able to identify:

- (1) amount of the issuance
- (2) date of issuance
- (3) date Federal funds are received and credited to a State account
- (4) amount of Federal funds received
- (5) date funds were requested

## 8.2 Federal Interest Liabilities

8.2.1 A Federal interest liability shall accrue from the day the State pays out its own funds for program purposes to the day Federal funds are credited to a State account. With regard to funds transferred out of the Federal Highway Trust Fund, if a State does not bill at least weekly for current project costs, the Federal interest liability shall not accrue prior to the day the State submits a request for funds.

8.2.2 The State shall use the following method to calculate Federal interest liabilities:

For all transactions where the State pays out its own funds for program purposes prior to receiving Federal funds, the State shall track each payment from the date it is paid out of a State account to the date Federal funds are subsequently credited to a State account to cover that outlay. The Federal interest liability on each payment shall be based on the difference in whole days between the two events. With Federal-State matching programs, interest shall be calculated on the Federal percentage of the disbursement.

## 8.3 The Unemployment Trust Fund

8.3.1 The State shall use the following method to calculate State interest liabilities on funds withdrawn from the several accounts in the Unemployment Trust Fund:

The State shall use the following methodology to calculate State interest liabilities on funds withdrawn from the State account in the UTF under the Unemployment Insurance program.

Based on statements provided by its financial institution (or other appropriate sources), the State shall determine the actual interest earnings and the related banking costs attributable to funds withdrawn from its account in the UTF. At the end of the State's fiscal year, the State shall calculate the percentage of its total unemployment compensation expenditures for (1) funds withdrawn from the State account in the UTF, or the State %, and (2) funds withdrawn from the Federal Employees Compensation Account (FECA) and the Extended Unemployment Compensation Account (EUCA) and any other accounts of Federal funds in the UTF, or the Federal %.

The actual interest earnings of the benefit payment account on the whole constitute the actual interest earnings attributable to funds withdrawn from the State account in the UTF, since the State shall apply an appropriate interest neutral funding technique, to funds withdrawn from the FECA and EUCA and any other benefit accounts of Federal funds in the UTF from which the State draws.

The State shall calculate the related banking costs attributable to funds withdrawn from the State account in the UTF by multiplying the State % by the amount of the related banking costs of the benefit payment account as a whole. The States liability for interest on funds withdrawn from its account in the UTF shall consist of the actual interest earnings of the benefit payment account on the whole less the related banking costs attributed to such funds.

#### 8.4 Refund Liabilities

8.4.1 The State shall be liable for interest on refunds from the date the refund is credited to a State account until the date the refund is debited from the State account for program purposes. The State shall apply a \$50,000 refund transaction threshold below which the State shall not incur or calculate interest liabilities on refunds. A transaction is defined as a single deposit.

8.4.2 For each refund, the State shall maintain information identifying:

- (1) date a refund is credited to a State account
- (2) date of the subsequent deposit of Federal funds against which the refund is offset
- (3) amount of the refund

8.4.3 The State shall use the following methodology to calculate interest liabilities on refunds:

With programs to which applicable interest neutral funding techniques are applied, the State interest liability shall be based on the difference in whole days between the date the refund is deposited in a State account and the date the refund is offset against a subsequent deposit of Federal funds.

#### 8.5 Exemptions

8.5.1 Where more than one State agency is a recipient of Federal funds under a program, a particular State agency's funding may be excluded from interest calculation procedures if the State agency receives an amount of funds less than 5 % of the State's threshold for major Federal assistance programs. Notwithstanding this potential exemption, however, in no case shall less than 90% of a program's total funding be subject to interest calculation procedures.

Proration of calculations: If less than total program funding is subject to interest calculation procedures, the resulting interest liability calculations shall be prorated to 100% of program funding.

#### 8.6 State Interest Liabilities

8.6.1 The State shall be liable for interest on Federal funds from the date Federal funds are credited to a State account until the date those funds are paid out for program purposes.

8.6.2 The State shall use the following method to calculate State interest liabilities on Federal funds:

##### 8.6.2.1 Measuring Time Funds Are Held

To determine the total time Federal funds are held, the State shall measure the time between the date Federal funds are received and credited to a State's account and the date those funds are debited from the State's account.

##### 8.6.2.2 Source of Data

The time period from the date Federal funds are received and credited to the State's account and the date those funds are debited from the State's account shall be determined from information captured by AFRS (Agency Financial Reporting System).

##### 8.6.2.3 Standards Applied

Census (Average Daily Balance):

The average daily cash balance of Federal Funds in the program's account reflects the actual activity of each draw from the date of deposit to the date of issuance or clearance, whichever is pertinent.

##### 8.6.2.4 Calculation Procedure

$I = ADB \times R$ , where

I = State's total interest liability

ADB = Average Daily Balance of cash in a program's account, measured from deposit to clearance

R = Annualized rate equal to the average equivalent yields of 13-week Treasury bills auctioned during a State's fiscal year

8.7.0 State interest liabilities may accrue if Federal funds are received by the State prior to the day the State pays out the funds for Federal assistance program purposes, in those cases where the State has not followed the interest-neutral funding techniques described in Section 6 of this Agreement. State interest liability accrues from the day Federal funds are credited to a State account to the day the State pays out the Federal funds for Federal assistance program purposes. (31 CFR 205.15.(a)) The State does not incur an interest liability to the Federal government if a Federal statute requires the State to retain or use for Federal assistance program purposes the interest earned on Federal funds. (31 CFR 205.15.(c)) In programs utilizing mandatory matching of Federal funds with State funds, the State must not arbitrarily assign its earliest costs to the Federal government. The State incurs interest liabilities if it draws Federal funds in advance and/or in excess of the required proportion of agreed upon levels of State contributions in programs utilizing mandatory matching of Federal funds with State funds. (31 CFR 205.15.(d))

## **9.0 REVERSE FLOW PROGRAMS**

The State is not required to cover any reverse flow programs under the terms of this Agreement because the State does not participate in the program.

## **10.0 INTEREST CALCULATION COSTS**

10.1 As set forth in 31 CFR 205.27, interest calculation costs are defined as those costs necessary for the actual calculation of interest, including the cost of developing and maintaining clearance patterns in support of the interest calculations. Interest calculation costs do not include expenses for normal disbursing services, such as processing of checks or maintaining records for accounting and reconciliation of cash balances, or expenses for upgrading or modernizing accounting systems. Interest calculation costs in excess of \$50,000 in any year are not eligible for reimbursement, unless the State provides justification with the annual report.

10.2 The State expects to incur the following types of interest calculation costs:

Interest calculation costs, Labor Costs and Data Processing costs related to developing warrant clearance patterns, and costs for calculating interest, including preparation of the CMIA annual report.

10.3 The State shall submit all claims for reimbursement of interest calculation costs with its Annual Report in accordance with 31 CFR 205.

## **11.0 NON-COMPLIANCE**

11.1 The provisions of 31 CFR Part 205.29 and 31 CFR Part 205.30 shall apply in cases of non-compliance with the terms of this Agreement.

**12.0 AUTHORIZED SIGNATURES**

Brian Tinney  
Assistant Director, Accounting Division Office of Financial Management State of Washington

DocuSigned by:  
*Brian Tinney*  
Signature: \_\_\_\_\_ Date Signed: 6/1/2023  
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Date Submitted 6/1/2023

Sandra R. Paylor  
Assistant Commissioner  
Revenue Collections Management  
Bureau of the Fiscal Service  
U.S. Department of the Treasury

DocuSigned by:  
*Sandra Paylor*  
Signature: \_\_\_\_\_ Date Signed: 6/4/2023  
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**Exhibit I - Funds Request and Receipt Times Schedule****State of Washington**

Federal Agency	Payment Type	Request Cut-Off Time	Receipt Window
Agriculture-FNS	ACH	11:59 PM	1 day
Agriculture-FNS	Fedwire	5:45 PM	0 day
Agriculture-FS	ACH	3:00 PM	1 day
Air National Guard	ACH	12:00 PM	15 days
Army National Guard	ACH	12:00 PM	15 days
Commerce-NOAA	ACH	2:00 PM	1 day
Dept of Homeland Security (FEMA)	Fedwire	2:00 PM	2 days
Dept of Homeland Security (ODP)	ACH	2:00 PM	2 days
Dept of Homeland Security (ODP)	Fedwire	2:00 PM	2 days
EPA	ACH	2:00 PM	2 days
EPA	Fedwire	2:00 PM	0 day
Education	ACH	3:00 PM	1 day
Education	Fedwire	2:00 PM	0 day
Energy	ACH	4:00 PM	1 day
Energy	Fedwire	3:00 PM	0 day
HHS	ACH	5:00 PM	1 day
HHS	Fedwire	3:00 PM	0 day
HUD	ACH	5:30 PM	2 days
HUD	Fedwire	3:00 PM	0 day
Interior-FWS	ACH	11:59 PM	1 day
Interior-FWS	Fedwire	5:45 PM	0 day
Interior-OSM	ACH	3:00 PM	1 day
Interior-OSM	Fedwire	1:00 PM	0 day
Justice	ACH	11:00 PM	6 days
Justice	Fedwire	2:00 PM	2 days
Labor-Non-UTF	ACH	3:00 PM	1 day
Labor-UTF	ACH	3:00 PM	1 day
Labor-UTF	Fedwire	3:00 PM	0 day
National Science Foundation (NSF)	ACH	8:00 PM	1 day
National Science Foundation (NSF)	Fedwire	5:45 PM	0 day
Social Security Administration	ACH	11:59 PM	1 day
Social Security Administration	Fedwire	5:45 PM	0 day
Transportation (FAA)	ACH	2:00 PM	1 day
Transportation (FHWA)	ACH	12:00 PM	3 days
Transportation (FHWA)	Fedwire	12:00 PM	0 day
Transportation (FTA)	ACH	2:00 PM	1 day
Veterans Administration	ACH	12:00 PM	3 days

**Exhibit II - State of Washington**  
**LIST OF STATE CLEARANCE TIMES**

**(Rounded Dollar-Weighted Average Day of Clearance)**

**Clearance Times Where the Timing of A Draw Down Is Based on A Clearance Pattern**

CFDA	Program Name	Recipient	%	Component	Technique	Rounded days
10.551	Supplemental Nutrition Assistance Program	Department of Social & Health Services	100.0	Direct Wire Settlement to Electronic Benefit (EBT) system contractor or by Electronic Funds Transfer (EFT)	Actual Clearance, ZBA - Same Day Payment	0 Days
10.557	Special Supplemental Nutrition Program for Women, Infants, and Children	Department of Health	66.0	Direct program/benefit payments for food voucher redemption. Rebates offset the direct program/benefit payments. This is a zero balance account.	Modified Direct Program Costs	0 Days
	Special Supplemental Nutrition Program for Women, Infants, and Children	Department of Health	34.0	Administrative costs including payroll - salary, benefits, contractual and related expenditures	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
10.559	Summer Food Service Program for Children	Superintendent of Public Instruction	100.0	Payments - reimbursements to school districts, private schools, child & adult care programs	Modified Direct Program/Benefit Costs - (ACH Drawdowns at Fixed Intervals - SPI)	0 Days
10.561	State Administrative Matching Grants for the Supplemental Nutrition Assistance Program	Department of Social & Health Services	100.0	Direct Wire Settlement to Electronic Benefit (EBT) system contractor or by Electronic Funds Transfer (EFT)	Actual Clearance, ZBA - Same Day Payment	0 Days
17.225 F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	Employment Security Department	76.0	Benefit Payments - Federal	UI Federal (Fedwire Same Day Payment Modified Actual Clearance ZBA)	0 Days
	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	Employment Security Department	24.0	Unemployment Insurance Administrative	UI Admin - Modified Payment Schedule (Fedwire Semi-Monthly)	0 Days

					Drawdown on Payday)	
17.225 S	Unemployment Insurance -- State Benefit Account	Employment Security Department	100.0	Benefit payments - State	Modified Pre-Issuance (Post-Issuance) (Fedwire Same Day Payment)	0 Days
20.205	Highway Planning and Construction	Bond Retirement Interest	13.24	Debt service	Pre-Issuance Grant Anticipation Revenue Vehicle (GARVEE) Bond Repayment	N/A
	Highway Planning and Construction	Department of Transportation	86.76	Contractor payments, payroll, administrative and other program costs	Direct Funding WSDOT	1 Day
84.010	Title I Grants to Local Educational Agencies	Superintendent of Public Instruction	5.0	Administrative costs including payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	1 Day
	Title I Grants to Local Educational Agencies	Superintendent of Public Instruction	95.0	Direct program/benefit payments to school districts, non-profits, service providers, and local educational agencies (LEA)	Modified Direct Program/Benefit Costs - (ACH Drawdowns at Fixed Intervals - SPI)	1 Day
84.027	Special Education -- Grants to States	Superintendent of Public Instruction	95.0	Direct Program/Benefit payments to public or private schools and service providers	Modified Direct Program/Benefit Costs - (ACH Drawdowns at Fixed Intervals - SPI)	N/A
	Special Education -- Grants to States	Superintendent of Public Instruction	5.0	Administrative costs including payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
84.425	Education Stabilization Fund	Superintendent of Public Instruction	10.0	SEA Reserve	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
	Education Stabilization Fund	Superintendent of Public Instruction	90.0	Direct program/payments to school districts, non-profits, service providers, and local educational agencies (LEA)	Modified Direct Program/Benefit Costs - (ACH Drawdowns at Fixed Intervals - SPI)	0 Days
93.558	Temporary Assistance for Needy Families	Department of Social & Health Services	83.67	Direct Assistance to clients via the Electronic Benefit Transfer (EBT)	Modified Direct Program Costs - Admin, Payroll,	0 Days

				system or by Electronic Funds Transfer (EFT) & One-Time Benefit Payments	Payments to Providers	
	Temporary Assistance for Needy Families	Department of Social & Health Services	16.33	Administrative costs including payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
93.563	Child Support Enforcement	Department of Social & Health Services	100.0	Administrative costs including payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
93.575	Child Care and Development Block Grant	Department of Children, Youth, and Families	5.0	Administrative costs	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	N/A
	Child Care and Development Block Grant	Department of Children, Youth, and Families	55.82	Direct program costs, admin, and payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	N/A
	Child Care and Development Block Grant	Department of Social & Health Services	39.18	Direct payments to providers for EFT and non-EFT payments	Modified Direct Program Costs	0 Days
93.658	Foster Care -- Title IV-E	Department of Children, Youth, and Families	100.0	Direct program costs, admin, and payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	N/A
93.767	Children's Health Insurance Program	Healthcare Authority	97.06	Direct payments to providers for EFT and non-EFT payments	Modified Direct Program Costs	0 Days
	Children's Health Insurance Program	Healthcare Authority	2.94	Admin and Payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
93.778	Medical Assistance Program	Department of Social & Health Services	3.66	Administrative costs including payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
	Medical Assistance Program	Department of Children, Youth, and Families	0.28	Direct payments to providers for EFT and non-EFT payments	Modified Direct Program Costs	0 Days

	Medical Assistance Program	Healthcare Authority	66.12	Direct payments to providers for EFT and non-EFT payments	Modified Direct Program Costs	0 Days
	Medical Assistance Program	Department of Social & Health Services	27.47	Direct payment to providers for EFT and non-EFT payments	Modified Direct Program Costs	0 Days
	Medical Assistance Program	Healthcare Authority	2.47	Administrative costs including payroll	Modified Direct Program Costs - Admin, Payroll, Payments to Providers	0 Days
97.036	Disaster Grants - Public Assistance (Presidentially Declared Disasters)	Military Department	7.0	Admin costs	Modified Administrative Costs - Annual	N/A
	Disaster Grants - Public Assistance (Presidentially Declared Disasters)	Military Department	93.0	Direct program costs	Modified Direct Program and Admin Costs - Monthly	N/A
97.050	Presidential Declared Disaster Assistance to Individuals and Households - Other Needs	Employment Security Department	100.0	Lost wages assistance	UI Federal (Fedwire Same Day Payment Modified Actual Clearance ZBA)	0 Days

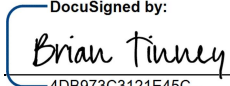
**Certification**

I hereby certify that an authorized State official has certified at least every five years that the "Rounded Days of Clearance" listed in Exhibit 2 of this Treasury-State Agreement:

1. Have been prepared in accordance with the standards provided in 31 CFR 205.20;
2. Accurately represent the flow of Federal funds under the Federal assistance programs to which they apply;
3. Reflect seasonal or other periodic variations in the clearance activities; and,
4. Are auditable.

Date: 6/1/2023

Printed Name: Brian Tinney

Certifying Signature:  4DB973C3121E45C...

Title: Assistant Director, Accounting