Cash Management Improvement Act Agreement  
between  
The State of Hawaii  
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 Hawaii (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 Hawaii shall be the Director of Finance 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


2.2 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 07/01/2020 and shall remain in effect until 06/30/2021.

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 State's most recent Single Audit Reports. The State determined its threshold based on the Single Audits performed for its agencies receiving Federal financial assistance for fiscal year ending 06/30/2019.

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 $23,218,503.

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

10.551 Supplemental Nutrition Assistance Program
10.555 National School Lunch Program
10.557 Special Supplemental Nutrition Program for Women, Infants, and Children
10.561 State Administrative Matching Grants for the Supplemental Nutrition Assistance Program
12.600 Community Investment
14.195 Section 8 Housing
14.850 Public and Indian Housing
14.871 Section 8 Housing Choice Vouchers
17.225F Unemployment Insurance -- Federal Benefit Account and Administrative Costs
17.225S Unemployment Insurance -- State Benefit Account
20.106 Airport Improvement Program
20.205 Highway Planning and Construction
84.010 Title I Grants to Local Educational Agencies
84.027 Special Education -- Grants to States
84.041 Impact Aid
84.063 Federal Pell Grant Program
84.268 Federal Direct Student Loan
93.558 Temporary Assistance for Needy Families
93.658 Foster Care -- Title IV-E
93.767 Children's Health Insurance Program
93.778 Medical Assistance Program

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:

There are currently no programs listed for Section 4.4.

4.5 State must notify Fiscal Service in writing within 30 days of the time State becomes aware of a Federal Assistance program change.

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:

Department of Education
Department of Health
Department of Human Services
Department of Labor and Industrial Relations
Department of Transportation
Hawaii Public Housing Authority
University of Hawaii

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:

Conduent State Healthcare, LLC 93.767 Children's Health Insurance Program
Conduent State Healthcare, LLC 93.778 Medical Assistance Program
Fidelity National Information Services, Inc (FIS) 93.558 Temporary Assistance for Needy Families
Fidelity National Information Services, Inc. (FIS) 10.551 Supplemental Nutrition Assistance Program
United Community Bank 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

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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.

Actual Clearance, ZBA - ACH

The State shall request funds such that they are deposited by ACH in a State account on the settlement date of payments issued by the State. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the request shall be for the amount of funds that clear the State’s account on the settlement date. This funding technique is interest neutral.

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.

Post-Issuance

The State shall request funds such that they are deposited in a 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. The amount of the request shall be the amount of the disbursement. This funding technique is not interest neutral.

Pre-Issuance

The State shall request funds such that they are deposited in a State account not more than three business days prior to the day the State makes a disbursement. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the request shall be the amount the State expects to disburse. This funding technique is not interest neutral.

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.

Direct Administrative Costs - Drawdowns on a Payroll Cycle

The State shall request funds for all direct administrative costs such that they are deposited on the dollar-weighted average date of clearance of payroll. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of funds requested shall be based on the amount of liabilities recorded for direct administrative costs since the last request for funds. This funding technique is interest neutral.

Indirect Cost Rates - Proportionate Shares
The State shall include a proportionate share of the indirect cost allowance in each request for funds by applying the indirect cost rate to the appropriate cost base of each drawdown. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the request shall be determined by applying the indirect cost rate to the appropriate cost base estimated in accordance with the drawdowns. This funding technique is interest neutral.

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 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.

Average Clearance: CFDA 20.106 Airport Improvement Program (DOT) (SU)

The State shall request funds such that they are deposited by ACH on the dollar-weighted average day of clearance for the disbursement, in accordance with the clearance pattern specified in Exhibit II. In accordance with Title 49 United State Code, Section 47111, payment request over 90% of the grant will require FAA manual approval. Payment will be released after all financial close out documentation has been provided and approved. The request shall be made in accordance with the appropriated Federal agency cut-off time specified in Exhibit I. The amount of the request shall be for the exact amount of funds that clear the State's account that day. In addition, under this funding technique, the State agrees to waive any claim to a federal interest liability and will not calculate the federal interest liability. This funding technique is interest neutral. This funding technique is interest neutral.

Payment Schedule (Monthly Drawdown) (SU)

The State shall request funds once a month for amounts that were disbursed in the prior month. The State shall not draw down the funds earlier than the dollar-weighted average day of the clearance pattern for checks issued by the applicable program. Neither the Federal Government nor the State shall incur an interest liability under the application of this technique. This funding technique is interest neutral.

Payment Schedule (Weekly Drawdown) (SU)

The State shall request funds once a week for amounts that were disbursed in the prior week. The State shall not draw down the funds earlier than the dollar-weighted average day of the clearance pattern for checks issued by the applicable program. Neither the Federal Government nor the State shall incur an interest liability under the application of this technique. This funding technique is interest neutral.

Payment Schedule Variation: CFDA 12.600 Community Investment (EDN) (SU)

The State Department of Education will prepare the Federal Standard Form 271 OUTLAY REPORT AND REQUEST FOR REIMBURSEMENT FOR CONSTRUCTION PROGRAMS on a quarterly basis. This form will be e-mailed to the U.S. Department of Defense for review. After review, the U.S. Department of Defense will electronically deposit funds in a State of Hawaii account. This funding technique is interest neutral.

Payment Schedule Variation: CFDA 84.041 Impact Aid Program (EDN) (SU)

The Federal Government shall make periodic payments to the State in accordance with 34 CRF Part 219 and 34 CRF Part 222. The State Department of Education is soley responsible for education and public instruction throughout the State, including education at the pre-school, primary, and secondary levels. The U.S. Secretary of Education determines
when the State is to receive funds and in what amount. The State does not drawdown the funds. Neither the Federal Government nor the State shall incur an interest liability under this technique. This funding technique is interest neutral.

Payment Schedule: CFDA 10.555 National School Lunch Program Payments (EDN) (SU)

The State shall request funds once a month from the United States Department of Agriculture (USDA) for other private schools, charter schools, and residential institutions. The request will be made within 25 business days after the State has submitted the Food Nutrition Services (FNS)-10 (30 day) report to USDA in accordance with the appropriate Exhibit I cut-off time. The funds request is based on the FNS-10 (30 day) report - number of meals served and the reimbursement rate prescribed under 7 Code of Federal Regulations (CRF) 210. The State shall request additional funds within 25 business days after the State has submitted the FNS-10 (90 day) report to USDA for any claim adjustments to the FNS-10 (30 day) report. This funding technique is interest neutral.

Same Day or Weekly Drawdown: CFDA 84.063 and 84.268 (UH) (SU)

The State shall request funds immediately following the distribution of aid or crediting of a loan to a student recipient. The federal agency will deposit funds into a state account in accordance with the schedule outlined in Exhibit 1. The amount requested shall be the amount of the federally approved aid or loan proceeds credited over the previous award period. This funding technique is interest neutral.


The State shall bill and request Highway Planning and Construction funds semi-monthly during the month immediately following the month after labor and non-labor expenses are incurred and paid using local, non-federal funds by the State or a subrecipient. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. Since the State does not bill weekly, the Federal interest liability shall not accrue prior to the day the State submits a request for funds. In addition, under this funding technique, the State agrees to waive any claim to a federal interest liability and will not calculate the federal interest liability. 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 Human Services
% of Funds Agency Receives: 100.00
Component: Direct wire settlement to the Electronic Benefit Transfer (EBT) system contractor or by Electronic Fund Transfer.
Technique: Actual Clearance, ZBA - Same Day Payment
Average Day of Clearance: 0 Days

10.555 National School Lunch Program
Recipient: Department of Education
% of Funds Agency Receives: 100.00
Component: Benefit payments
Technique: Payment Schedule: CFDA 10.555 National School Lunch Program Payments (EDN) (SU)
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: 69.00
Component: Food Rebate (16.0%); Food Benefit (53.0%)
Technique: Actual Clearance, ZBA - Same Day Payment
Average Day of Clearance: 0 Days

Recipient: Department of Health
% of Funds Agency Receives: 2.00
Component: Indirect Costs (Nutrition Services and Administrative [NSA])
Technique: Indirect Cost Rates - Proportionate Shares
Average Day of Clearance: N/A

Recipient: Department of Health
% of Funds Agency Receives: 29.00
Component: Direct Administrative and Payroll (Nutrition Services and Administrative [NSA])
Technique: Pre-Issuance
Average Day of Clearance: N/A

10.561 State Administrative Matching Grants for the Supplemental Nutrition Assistance Program
Recipient: Department of Human Services
% of Funds Agency Receives: 100.00
Component: Administrative Costs (Payroll - 69%; Other - 31%)
Technique: Direct Administrative Costs - Drawdowns on a Payroll Cycle
Average Day of Clearance: N/A

12.600 Community Investment
Recipient: Department of Education
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Payment Schedule Variation: CFDA 12.600 Community Investment (EDN ) (SU)
Average Day of Clearance: 0 Days

14.195 Section 8 Housing
Recipient: Hawaii Public Housing Authority
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Actual Clearance, ZBA - ACH
Average Day of Clearance: 0 Days
14.850 Public and Indian Housing
Recipient: Hawaii Public Housing Authority
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Actual Clearance, ZBA - ACH
Average Day of Clearance: 2 Days

14.871 Section 8 Housing Choice Vouchers
Recipient: Hawaii Public Housing Authority
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Actual Clearance, ZBA - Same Day Payment
Average Day of Clearance: 0 Days

17.225F Unemployment Insurance -- Federal Benefit Account and Administrative Costs
Recipient: Department of Labor and Industrial Relations
% of Funds Agency Receives: 25.00
Component: Other Costs
Technique: Direct Administrative Costs - Drawdowns on a Payroll Cycle
Average Day of Clearance: 0 Days
Recipient: Department of Labor and Industrial Relations
% of Funds Agency Receives: 75.00
Component: Payroll
Technique: Direct Administrative Costs - Drawdowns on a Payroll Cycle
Average Day of Clearance: 0 Days

17.225S Unemployment Insurance -- State Benefit Account
Recipient: Department of Labor and Industrial Relations
% of Funds Agency Receives: 100.00
Component: Benefit Payments
Technique: Actual Clearance, ZBA - Same Day Payment
Average Day of Clearance: 0 Days

20.106 Airport Improvement Program
Recipient: Department of Transportation
% of Funds Agency Receives: 99.60
Component: Construction and Consultant Cost (99.60%)
Technique: Average Clearance: CFDA 20.106 Airport Improvement Program (DOT) (SU)
Average Day of Clearance: 7 Days
Recipient: Department of Transportation
% of Funds Agency Receives: 0.40
Component: Administrative Cost
Technique: Payment Schedule (Monthly Drawdown) (SU)
Average Day of Clearance: 0 Days

20.205 Highway Planning and Construction
Recipient: Department of Transportation
% of Funds Agency Receives: 100.00
Component: All Program Funds
Average Day of Clearance: 8 Days

84.010 Title I Grants to Local Educational Agencies
Recipient: Department of Education
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Payment Schedule (Weekly Drawdown) (SU)
Average Day of Clearance: 0 Days

84.027 Special Education -- Grants to States
Recipient: Department of Education
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Payment Schedule (Weekly Drawdown) (SU)
Average Day of Clearance: 0 Days

84.041 Impact Aid
Recipient: Department of Education
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Payment Schedule Variation: CFDA 84.041 Impact Aid Program (EDN) (SU)
Average Day of Clearance: 0 Days

84.063 Federal Pell Grant Program
Recipient: University of Hawaii
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Same Day or Weekly Drawdown: CFDA 84.063 and 84.268 (UH) (SU)
Average Day of Clearance: 0 Days

84.268 Federal Direct Student Loan
Recipient: University of Hawaii
% of Funds Agency Receives: 100.00
Component: All Program Funds
Technique: Same Day or Weekly Drawdown: CFDA 84.063 and 84.268 (UH) (SU)
Average Day of Clearance: 0 Days
93.558 Temporary Assistance for Needy Families  
Recipient: Department of Human Services  
% of Funds Agency Receives: 88.00  
Component: Electronic Benefit Payments for Temporary Assistance to Needy Family  
Technique: Actual Clearance, ZBA - ACH  
Average Day of Clearance: 0 Days

Recipient: Department of Human Services  
% of Funds Agency Receives: 12.00  
Component: Administrative Costs  
Technique: Payment Schedule (Monthly Drawdown) (SU)  
Average Day of Clearance: 0 Days

93.658 Foster Care -- Title IV-E  
Recipient: Department of Human Services  
% of Funds Agency Receives: 86.00  
Component: Direct Administrative and Training Costs  
Technique: Direct Administrative Costs - Drawdowns on a Payroll Cycle  
Average Day of Clearance: 0 Days

Recipient: Department of Human Services  
% of Funds Agency Receives: 14.00  
Component: Assistance Payments  
Technique: Payment Schedule (Monthly Drawdown) (SU)  
Average Day of Clearance: 0 Days

93.767 Children's Health Insurance Program  
Recipient: Department of Human Services  
% of Funds Agency Receives: 100.00  
Component: All Program Funds  
Technique: Post-Issuance  
Average Day of Clearance: 1 Day

93.778 Medical Assistance Program  
Recipient: Department of Human Services  
% of Funds Agency Receives: 100.00  
Component: Benefit Payments - Medquest and Medicaid  
Technique: Post-Issuance  
Average Day of Clearance: 1 Day

6.3.3 Materiality Exemptions

Agencies exempt from coverage on the basis of materiality:

None.
7.0 CLEARANCE PATTERNS

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

a. Functional Payment: Payroll - State Central Payroll Checks
b. The programs as described in section 4.2 that meet or exceed the threshold

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

Department of Budget and Finance
Department of Accounting and General Services, Information & Communication Services Division

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

State's central Financial Accounting and Management Information System (FAMIS), Check Reconciliation System, Check Writing System and the Department of Education's Central Accounting System.

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:

None.

The State shall also adjust each clearance pattern to reflect:

The State shall adjust each clearance pattern to reflect actual date the checks cleared the State's bank account for other than Department of Education checks. To arrive at the date the check was debited from the State's account (7.5, Item 2) the average day of clearance must be reduced by 1.45 days. The State computer files show the cashed date as the date the checks were returned to the State Treasury by the drawee bank. However, the checks were redeemed and charged to the State's bank account by the drawee bank on the prior banking day. Accordingly, the average day of clearance is
overstated by approximately 1.45 calendar days. The “rounded average day of clearance” in Exhibit II is adjusted to reflect the day the checks were cashed at the drawee bank and charged to the State's bank account. The following is the computation of the 1.45 days factor:

State of Hawaii Agencies (Other than Department of Education)

Clearance Pattern Adjustment:

Check Cashed by Bank; Recorded Cashed by State; Difference-Cashed & Recorded

Monday; Tuesday; 1 day
Tuesday; Wednesday; 1 day
Wednesday; Thursday; 1 day
Thursday; Friday; 1 day
Friday; Monday; 3 days

Total difference = 7 days

Computation to determine number of days to be adjusted:

39 weeks x (7/5) = 54.60
(Holiday Factor) 13 weeks x (8/5) = 20.80
52 weeks = 75.40 / 52 weeks = 1.45 days

1.45 days will be reduced from the State-calculated clearance pattern to arrive at the clearance pattern to be used by the State in Exhibit II.

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.

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 - ACH
Actual Clearance, ZBA - Same Day Payment
Average Clearance: CFDA 20.106 Airport Improvement Program (DOT) (SU)
Direct Administrative Costs - Drawdowns on a Payroll Cycle
Indirect Cost Rates - Proportionate Shares
Payment Schedule Variation: CFDA 12.600 Community Investment (EDN ) (SU)
Payment Schedule Variation: CFDA 84.041 Impact Aid Program (EDN) (SU)
Payment Schedule (Monthly Drawdown) (SU)
Payment Schedule (Weekly Drawdown) (SU)
Payment Schedule: CFDA 10.555 National School Lunch Program Payments (EDN) (SU)
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 several accounts in the UTF under the Unemployment Insurance program.

Based on statements provided by its financial institution, or other appropriate source, 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 States 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 State shall calculate the actual interest earnings and the related banking costs attributable to funds withdrawn from the State account in the UTF by multiplying the State % by the amount of the actual interest earnings and the related banking costs of the 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 attributable to such funds less the related banking costs attributed to such funds.
The State shall determine the average daily cash balance of its unemployment compensation benefit payment account for its fiscal year. The State shall calculate the average daily cash balance of Federal funds by multiplying the Federal % by the average daily cash balance of the benefit payment account on the whole. The States liability for interest on funds withdrawn from the FECA and EUCA (and any other benefit accounts of Federal funds in the UTF from which the State draws funds) shall be the average daily cash balance of Federal funds multiplied by the annualized rate equal to the average equivalent yields of 13-week Treasury bills auctioned during the States fiscal year.

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:

For programs to which applicable non-interest neutral funding techniques are applied, each State agency shall maintain records identifying:

(1) the date of the refund
(2) the date the refund is offset against subsequent deposit of Federal funds
(3) the check issue date for the disbursement related to the subsequent deposit of Federal funds
(4) the amount of the refund

Interest shall be calculated based on the difference in whole days between the date the refund is deposited in a State account and the date the refund is paid out for program purposes. The State shall measure this period by dividing it into three periods: the pre-offset period, the pre-disbursement period, and the clearance period.

The pre-offset period is from deposit of the refund to the subsequent deposit of Federal funds against which the refund is offset. The pre-disbursement period is from the deposit of Federal funds against which the refund is offset to the issuance of checks, as measured by period one calculations. The clearance period is from the issuance of checks to the clearance of checks.

8.4.4 Refunds for the Special Supplemental Food program (CFDA 10.557) is exempt from interest liabilities as long as the interest earned from the refund is used for program purposes.

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 separately measure two time periods: (1) the date Federal funds are deposited to the date checks are issued; and (2) the date checks are issued to the date 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 a State account and the date those funds are expended by check from the State's account shall be determined from information captured in the State's FAMIS and supplementary accounting information kept at the department or agency-level. The check expended (issued) date is adjusted by the check clearance pattern specified in Exhibit II to arrive at the cash disbursement date.

8.6.2.3 Standards Applied

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

\[ I = P \times r \times (P_I + C_T), \]

where

\[ I = \] State’s total interest liability

\[ P = \] Total annual expenditures of Federal funds for program or component cash flow of program

\[ r = \] Annualized rate equal to the average equivalent yields of 13-week Treasury bills auctioned during a State's fiscal year divided by 365 days

\[ P_I = \] Dollar-weighted average number of days Federal funds are held by State prior to issuance

\[ C_T = \] Dollar-weighted average number of days Federal funds are held by State between issuance and clearance of checks, as determined by the appropriate clearance pattern in Exhibit II

9.0 REVERSE FLOW PROGRAMS

The State is not required to cover any reverse flow programs under the terms of this Agreement because the program falls below the State’s threshold.

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:

The State expects to incur the following costs for interest calculation and clearance pattern maintenance:

Staff Time
Systems Operations

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

Craig Hirai
Director of Finance
State of Hawaii
Department of Budget and Finance
Signature: ____________________________ Date Signed: Jun 26, 2020

Date Submitted 06/15/2020

Corvelli A. McDaniel
Assistant Commissioner
Revenue Collections Management
Bureau of the Fiscal Service
U.S. Department of the Treasury
Signature: ____________________________ Date Signed: Jul 2, 2020
## Exhibit I - Funds Request and Receipt Times Schedule

**State of Hawaii**

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

<table>
<thead>
<tr>
<th>CFDA</th>
<th>Program Name</th>
<th>Recipient</th>
<th>%</th>
<th>Component</th>
<th>Technique</th>
<th>Rounded days</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.551</td>
<td>Supplemental Nutrition Assistance Program</td>
<td>Department of Human Services</td>
<td>100.00</td>
<td>Direct wire settlement to the Electronic Benefit Transfer (EBT) system contractor or by Electronic Fund Transfer.</td>
<td>Actual Clearance, ZBA - Same Day Payment</td>
<td>0 Days</td>
</tr>
<tr>
<td>10.555</td>
<td>National School Lunch Program</td>
<td>Department of Education</td>
<td>100.00</td>
<td>Benefit payments</td>
<td>Payment Schedule: CFDA 10.555 National School Lunch Program Payments (EDN) (SU)</td>
<td>0 Days</td>
</tr>
<tr>
<td>10.557</td>
<td>Special Supplemental Nutrition Program for Women, Infants, and Children</td>
<td>Department of Health</td>
<td>29.00</td>
<td>Direct Administrative and Payroll (Nutrition Services and Administrative [NSA])</td>
<td>Pre-Issuance</td>
<td>N/A</td>
</tr>
<tr>
<td>10.557</td>
<td>Special Supplemental Nutrition Program for Women, Infants, and Children</td>
<td>Department of Health</td>
<td>2.00</td>
<td>Indirect Costs (Nutrition Services and Administrative [NSA])</td>
<td>Indirect Cost Rates - Proportionate Shares</td>
<td>N/A</td>
</tr>
<tr>
<td>10.557</td>
<td>Special Supplemental Nutrition Program for Women, Infants, and Children</td>
<td>Department of Health</td>
<td>69.00</td>
<td>Food Rebate (16.0%); Food Benefit (53.0%)</td>
<td>Actual Clearance, ZBA - Same Day Payment</td>
<td>0 Days</td>
</tr>
<tr>
<td>10.561</td>
<td>State Administrative Matching Grants for the Supplemental Nutrition Assistance Program</td>
<td>Department of Human Services</td>
<td>100.00</td>
<td>Administrative Costs (Payroll - 69%; Other - 31%)</td>
<td>Direct Administrative Costs - Drawdowns on a Payroll Cycle</td>
<td>N/A</td>
</tr>
<tr>
<td>12.600</td>
<td>Community Investment</td>
<td>Department of Education</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Payment Schedule Variation: CFDA 12.600 Community Investment (EDN) (SU)</td>
<td>0 Days</td>
</tr>
<tr>
<td>14.195</td>
<td>Section 8 Housing</td>
<td>Hawaii Public Housing Authority</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Actual Clearance, ZBA - ACH</td>
<td>0 Days</td>
</tr>
<tr>
<td>14.850</td>
<td>Public and Indian Housing</td>
<td>Hawaii Public Housing Authority</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Actual Clearance, ZBA - ACH</td>
<td>2 Days</td>
</tr>
<tr>
<td>14.871</td>
<td>Section 8 Housing Choice Vouchers</td>
<td>Hawaii Public Housing Authority</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Actual Clearance, ZBA - Same Day Payment</td>
<td>0 Days</td>
</tr>
<tr>
<td>17.225F</td>
<td>Unemployment Insurance -- Federal Benefit Account and Administrative Costs</td>
<td>Department of Labor and Industrial Relations</td>
<td>25.00</td>
<td>Other Costs</td>
<td>Direct Administrative Costs - Drawdowns on a Payroll Cycle</td>
<td>0 Days</td>
</tr>
<tr>
<td>17.225F</td>
<td>Unemployment Insurance -- Federal Benefit Account and Administrative Costs</td>
<td>Department of Labor and Industrial Relations</td>
<td>75.00</td>
<td>Payroll</td>
<td>Direct Administrative Costs - Drawdowns on a Payroll Cycle</td>
<td>0 Days</td>
</tr>
<tr>
<td>17.225S</td>
<td>Unemployment Insurance -- State Benefit Account</td>
<td>Department of Labor and Industrial Relations</td>
<td>100.00</td>
<td>Benefit Payments</td>
<td>Actual Clearance, ZBA - Same Day Payment</td>
<td>0 Days</td>
</tr>
<tr>
<td>20.106</td>
<td>Airport Improvement Program</td>
<td>Department of Transportation</td>
<td>0.40</td>
<td>Administrative Cost</td>
<td>Payment Schedule (Monthly Drawdown) (SU)</td>
<td>0 Days</td>
</tr>
<tr>
<td>CFDA</td>
<td>Program Name</td>
<td>Recipient</td>
<td>%</td>
<td>Component</td>
<td>Technique</td>
<td>Rounded days</td>
</tr>
<tr>
<td>--------</td>
<td>--------------------------------------------------</td>
<td>------------------------------------</td>
<td>--------</td>
<td>-----------------------------------------------</td>
<td>--------------------------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>20.106</td>
<td>Airport Improvement Program</td>
<td>Department of Transportation</td>
<td>99.60%</td>
<td>Construction and Consultant Cost (99.60%)</td>
<td>Average Clearance: CFDA 20.106 Airport Improvement Program (DOT) (SU)</td>
<td>7 days</td>
</tr>
<tr>
<td>20.205</td>
<td>Highway Planning and Construction</td>
<td>Department of Transportation</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Semi-Monthly Billing: CFDA 20.205 Highway Planning and Construction (DOT) (SU)</td>
<td>8 days</td>
</tr>
<tr>
<td>84.010</td>
<td>Title I Grants to Local Educational Agencies</td>
<td>Department of Education</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Payment Schedule (Weekly Drawdown) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>84.027</td>
<td>Special Education -- Grants to States</td>
<td>Department of Education</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Payment Schedule (Weekly Drawdown) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>84.041</td>
<td>Impact Aid</td>
<td>Department of Education</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Payment Schedule Variation: CFDA 84.041 Impact Aid Program (EDN) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>84.063</td>
<td>Federal Pell Grant Program</td>
<td>University of Hawaii</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Same Day or Weekly Drawdown: CFDA 84.063 and 84.268 (UH) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>84.268</td>
<td>Federal Direct Student Loan</td>
<td>University of Hawaii</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Same Day or Weekly Drawdown: CFDA 84.063 and 84.268 (UH) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>93.558</td>
<td>Temporary Assistance for Needy Families</td>
<td>Department of Human Services</td>
<td>12.00</td>
<td>Administrative Costs</td>
<td>Payment Schedule (Monthly Drawdown) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>93.558</td>
<td>Temporary Assistance for Needy Families</td>
<td>Department of Human Services</td>
<td>88.00</td>
<td>Electronic Benefit Payments for Temporary Assistance to Needy Family</td>
<td>Actual Clearance, ZBA - ACH</td>
<td>0 days</td>
</tr>
<tr>
<td>93.658</td>
<td>Foster Care -- Title IV-E</td>
<td>Department of Human Services</td>
<td>14.00</td>
<td>Assistance Payments</td>
<td>Payment Schedule (Monthly Drawdown) (SU)</td>
<td>0 days</td>
</tr>
<tr>
<td>93.658</td>
<td>Foster Care -- Title IV-E</td>
<td>Department of Human Services</td>
<td>86.00</td>
<td>Direct Administrative and Training Costs</td>
<td>Direct Administrative Costs - Drawdowns on a Payroll Cycle</td>
<td>0 days</td>
</tr>
<tr>
<td>93.767</td>
<td>Children's Health Insurance Program</td>
<td>Department of Human Services</td>
<td>100.00</td>
<td>All Program Funds</td>
<td>Post-Issuance</td>
<td>1 day</td>
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<tr>
<td>93.777</td>
<td>Medical Assistance Program</td>
<td>Department of Human Services</td>
<td>100.00</td>
<td>Benefit Payments - Medquest and Medicaid</td>
<td>Post-Issuance</td>
<td>1 day</td>
</tr>
</tbody>
</table>

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: Jun 26, 2020
Craig Hirai

Certifying Signature: ____________________________

Title: Director of Finance