



State of Vermont
Department of Finance and Management

Guide to the Cash Management Improvement Act
Treasury/State Agreement (TSA)

FY 2020

Prepared by: Karen Jaquish
Vermont CMIA Coordinator



Table of Contents

Overview	1
1.0 Agents of the Agreement	1
2.0 Authority.....	2
Duration, Amending and Terminating Miscellaneous Provisions	2
4.0 Programs Covered	3
5.0 Entities Covered.....	4
6.0 Funding Techniques	4
6.2 Description of Funding Techniques	7
Actual Clearance, ZBA – ACH.....	7
Actual Clearance, ZBA – Same Day Payment	7
Average Clearance	7
Block Grants Where State Cannot Trace Disbursements	8
Reverse Flow Program - SSI	8
Actuals at Fixed Intervals.....	8
Bi-Weekly Actual.....	8
Payment Schedule-Quarterly Estimates-Other	9
Payment Schedule-Quarterly Estimates-Payroll Cycle.....	9
Prior Month's Actual	9
Weekly Billing Cycle.....	9
7.0 Clearance Patterns	11
8.0 Interest Calculation Methodology	15
9.0 Reverse Flow Programs	17
10.0 Interest Calculation Costs.....	17
11.0 Non-Compliance.....	18
12.0 Authorized Signatures.....	18
Appendix I.....	i
Appendix II	ii

This guide was created for the purpose of explaining the contents of and processes behind Vermont's FY20 Treasury-State Agreement (TSA). It should be used as a reference guide for the State of Vermont's agencies and departments that have federal programs covered by the TSA in that it both explains the provisions of the TSA and describes the funding techniques to be used for all programs. This document is not intended to replace the TSA itself and if any discrepancies are found between it and the TSA, the TSA will prevail. For easy reference, all sections of this manual directly correspond to sections in the Treasury-State Agreement.

Overview

The Cash Management Improvement Act (CMIA) is a federal regulation created for the purpose of ensuring "greater efficiency, effectiveness, and equity in the exchange of funds between the Federal Government and the States." The spirit of CMIA is that states will draw in federal funds when they are needed; they will not draw in early and gain interest on the funds, nor will they draw in late and pay out their own funds for federal purposes.

Efficiency – minimizing the time between the transfer of funds to the State and the payout of those funds for program purposes. (i.e. The State should draw in funds on the exact day that they are paid out which is the day they leave the State's bank.)

Effectiveness – ensuring funds will be available when requested. The TSA, also called the CMIA agreement, specifies how and when funds will be transferred under major Federal assistance programs.

Equity – compensating the party that is "out-of-pocket" when funding a Federal program. In general, interest is due to the State if it must use its own funds for program purposes when there is valid federal obligational authority. Interest is payable by the State for the time the State holds Federal funds in its account prior to its disbursement for program purposes.

CMIA regulations require each state to enter into a Treasury-State Agreement with the U.S. Treasury and to submit an annual interest report. The TSA is a means of quantifying drawdown procedures and interest calculation techniques for all of Vermont's major programs. The annual interest report is compiled in December each year which results in an exchange of interest with the U.S. Treasury for CMIA programs. The basis for the interest report is the terms of the TSA and, essentially, if the terms are not met, an interest liability may result. This document explains each section of the TSA and provides information pertaining to the unique terms of Vermont's agreement.

1.0 Agents of the Agreement

The TSA must specify who the authorized officials are for both the State and for the U.S. Treasury. These authorized officials are also the signatories of the document. (See section 12.)

1.1 The authorized official for the State of Vermont is the Commissioner of Finance & Management, Adam Greshin.

1.2 The authorized official for the U.S. Department of the Treasury is the Assistant Commissioner, Revenue Collections Management, Bureau of the Fiscal Service (BFS), Corvelli A. McDaniel.

In addition to the authorized officials, each state must designate a CMIA Coordinator. This individual is the State's liaison with the U.S. Treasury and is responsible for submitting the TSA and interest report annually. The U.S. Treasury also designates a contact in its BFS division to be the main point of contact for each state. All communication between the State and U.S. Treasury occurs between these two individuals. Questions about CMIA or the TSA should be directed to Vermont's CMIA Coordinator in the Financial Operations Division of the Department of Finance & Management (F&M). (Please contact Vermont's CMIA Coordinator and not the U.S. Treasury contact directly.) If a program has a status change or requires a new funding technique for one

or more of its components as the year progresses, please notify the Vermont CMIA Coordinator as soon as possible and an amendment will be filed if determined necessary.

- Vermont CMIA Coordinator – Karen Jaquish, Statewide Grants Administrator, Department of Finance & Management
- U.S. Treasury Coordinator – Connie Kitchings, Bureau of the Fiscal Service, U.S. Treasury

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 Act of 1992 (Public Law 102-589) which are codified at 31 USC 6501 and 31 USC 6503.

2.2 The specific regulations for the Treasury/State Agreement and Annual Interest Report of the Cash Management Improvement Act are codified at 31 CFR Part 205-Rules and Procedures for Efficient Federal-State Funds Transfers. The entire code can be accessed at the U.S. Treasury's BFS website at <https://www.fiscal.treasury.gov/cmia/resources-cmia-statute.html>.

For additional information about CMIA, you can also browse the BFS CMIA website at <https://www.fiscal.treasury.gov/cmia/>.

Duration, Amending and Terminating Miscellaneous Provisions

3.1 This agreement shall take effect on July 1, 2019 and shall remain in effect until June 30, 2020. Therefore, all covered program drawdowns must follow the TSA specifications for all of SFY 2020.

The TSA is in effect for one year only and must be updated each fiscal year. Each year's TSA is considered an amendment. The bulk of the TSA remains the same from year to year, but annual updates include setting the new threshold, adding new programs that rise above the threshold, and removing any programs that no longer qualify as a covered federal program. The TSA must be resubmitted electronically to the U.S. Treasury using their database (CMIAS) in time to be approved prior to the State's fiscal year beginning date of July 1. For this reason, BFS has set a deadline of 30 days after the publication of the State's single audit report for submission of the following year's amendment. Therefore, the TSA is due to BFS on April 30 if the single audit report was published on March 31.

There were several program changes reflected in the 2020 TSA. The following is a summary of these changes:

- Four programs (66.468, 84.126, 93.575 and 93.658) fell below the threshold and were removed from the TSA.
- No new programs were added.
- There were several component and funding technique changes to existing covered programs in AHS. These changes include adding two funding techniques: creation of a new State-specific funding technique (Actuals at Fixed Intervals) and adding an existing federal Miscellaneous technique (Block Grants Where State Cannot Trace Disbursements).

3.2 Barring any interim amendments, these techniques will be in effect until June 30, 2020.

If necessary, it is possible to amend the agreement mid-year if program changes occur or if errors are found in the current agreement.

Any significant program changes, (i.e. termination of a program, changes in check issuance schedules, etc.) must be made known to the State's CMIA Coordinator as soon as possible. The CMIA Coordinator will work with BFS to determine whether or not an amendment is necessary.

3.3 Non-major Programs

Although not specifically covered in the TSA, the amount of time between fund transfers and program expenditures must also be kept to a minimum for non-major programs. Departments that administer federal programs that fall below the threshold for a major federal program and are not

covered under the TSA should review 31 CFR 205 Part B which requires the timeliness of federal draws.

In addition, the Vermont Department of Finance & Management issued Policy #2-Cash Management Policy for Federal Funds effective July 1, 2007. This policy specifies minimum standards for all federal draws made by the State of Vermont. Although all federal funds are subject to the terms of the policy, the main focus is on non-major programs not covered under the TSA.

3.4 This Agreement may be terminated by either the State of Vermont's Department of Finance & Management or the Bureau of the Fiscal Service (BFS) with 30 days' written notice. If this Agreement is terminated, BFS will prescribe the funding techniques, clearance patterns, and methods for calculating interest liabilities to be used by the State.

4.0 Programs Covered

One of the requirements of the TSA is the establishment of a covered program threshold. This threshold is a calculation defined by federal regulation and performed by the State. This threshold determines which programs must be covered in the TSA. Vermont's 2020 threshold of \$12,316,690 was virtually unchanged from the 2019 threshold of \$ 12,311,709.

Although the threshold stayed almost exactly the same, the net number of covered programs decreased in 2020 to 12 as compared to 16 in 2019. The programs dropped are: 66.468 – *Capitalization Grants for Drinking Water State Revolving Fund*, 84.126 – *Rehabilitation Services – Vocational Rehabilitation Grants to States*, 93.575 – *Child Care and Development Block Grant*, and 93.658 – *Foster Care – Title IV-E*.

There are no program exclusions in Section 4.4.

4.1 According to federal regulation, the threshold for a major federal program is calculated annually and is based upon expenditures reported in the most recent single audit available. For the 2020 TSA, the 2018 single audit expenditures were used.

4.2 The State's threshold for major Federal assistance programs of \$ 12,316,690 was calculated using the formulas illustrated below. (See 31 CFR §205.5 for the formula.) To ensure the State's threshold provides adequate coverage, federal regulations require that a State calculate its threshold using two formulas and compare the difference in program coverage between the two. If the difference between the total programs covered using both thresholds is less than 10%, the higher threshold is valid, resulting in fewer covered programs. If the difference is greater than 10%, the threshold must be lowered (programs added) until a difference of 10% or less is achieved.

For 2020, the following calculations were made to determine and verify the threshold:

Formula 1:

Net federal assistance expenses State of Vermont SEFA - FY2018: \$ 2,052,781,675

Percentage assigned by regulation (found at 31 CFR §205.5 Table A): 0.6 percent

State of Vermont Threshold FY 2020 = \$ 2,052,781,675 x .6% = \$ 12,316,690

Total of all programs meeting the .6% threshold = \$ 1,679,870,306

Formula 2:

Net federal assistance expenses State of Vermont SEFA - FY2018: \$ 2,052,781,675

One half of the percentage used in Formula 1: 0.3 percent

State of Vermont Threshold FY 2020 = \$ 2,052,781,675 x .3% = \$ 6,158,345

Total of all programs meeting the .3% threshold = \$ 1,861,980,844

Verify:

Programs covered using .3% threshold minus those covered using .6% threshold:

\$ 1,861,980,844 - \$ 1,679,870,306 = \$ 182,110,538

This difference divided by total expenditures: \$ 182,110,538/\$2,052,781,675 = 8.87%

Since 8.87% is less than 10%, the .6% level is considered valid and the program threshold of \$ 12,316,690 may be used.

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

Program	VT Agency
10.551 - Food Stamps	AHS
10.555 - National School Lunch Program for Children	Education
12.401 – National Guard Military Operation & Maintenance	Military
17.225 - Unemployment Insurance (State and Federal)	Labor
20.205 - Highway Planning and Construction (FHWA)	Transportation
20.509 – Public Transportation for Nonurbanized Areas	Transportation
84.010 - Title I Grants to Local Educational Agencies	Education
84.027 - Special Education – Grants to States	Education
93.558 - Temporary Assistance for Needy Families	AHS
93.568 - Low Income Home Energy Assistance	AHS
93.778 - Medical Assistance Program	AHS
96.006 - Supplemental Security Income (Reverse Flow Program)	AHS/SSI

4.3 When a non-major program continually fails to adhere to CMIA regulations, BFS may require that program to be included in the TSA regardless of the covered program threshold.

There are no non-major programs required to be covered by BFS in accordance with the non-compliance provisions of Subpart B of 31 CFR Part 205 in Vermont’s 2020 TSA.

4.4 Program Exclusions: In accordance with 31 CFR §205.4, it is possible, in certain circumstances, to exclude programs or components of programs that would otherwise be required to be covered in the TSA. A program component may be excluded if the program is administered by multiple State agencies and it meets several conditions outlined in section §205.4(b). An entire program may be excluded only if it has been discontinued since the last single audit or if a multi-year grant has an award balance that is below the covered program threshold.

There have been program exclusions in prior years, but there are none in the 2020 TSA.

5.0 Entities Covered

5.1 Due to the fact that they have programs above the CMIA threshold that are not excluded in Section 4.4, the following State agencies shall be subject to the terms of this agreement:

- Agency of Education
- Agency of Human Services
- Agency of Transportation
- Department of Labor
- Military Department

5.2 Fiscal Agents: A fiscal agent is an entity that pays, collects, or holds Federal funds on behalf of the State in furtherance of a Federal program, exclusive of a private nonprofit community organization.

- Conduent State & Local Solutions is the fiscal agent for CFDA 93.558-TANF, 93.568-LIHEAP, and 10.551-Food Stamps
- DXC Technology is the fiscal agent for CFDA 93.778-Medicaid

6.0 Funding Techniques

Funding techniques are methods by which funds are drawn down as defined by the Treasury-State Agreement. These methods are negotiated by F&M and BFS. Funding techniques often rely on clearance patterns in determining when funds are drawn down (See section 7.0 Clearance Patterns) and can be either interest neutral or interest bearing. Most of the funding techniques contained in Vermont’s 2020 TSA are interest neutral, with the exception of the following: Prior Month’s Actual and Weekly Billing Cycle. (See Section 6.2 Description of Funding Techniques)

6.1 General Terms: The following general terms are included in each State's TSA.

- 6.1.1 Exhibit I in the TSA outlines the cut-off times for requesting drawdowns from various federal entities. This schedule should be used when scheduling draws to assure that funds will arrive on time, or the State will receive compensation for delay in funding. Exhibit I can be found in Appendix I of this document.
- 6.1.2 Exhibit II in the TSA outlines the funding techniques and clearance patterns that shall be used for each program component when drawing down funds. The clearance patterns are used for components that utilize a funding technique that relies on clearance patterns (Average Clearance, Actual Clearance-ZBA, etc.) If a funding technique draws down funds at set intervals that may not be directly related to check issuance dates, clearance patterns will not apply. See section 6.2 for descriptions of each funding technique and whether or not a clearance pattern is applied.
- 6.1.3 In instances where the day of average clearance falls on a Saturday, the State shall request funds for deposit on Friday. In instances where the day of average clearance falls on a Sunday, the State shall request funds for deposit on Monday. In cases where the day of average clearance falls on a day when the State is not open for business (i.e. holiday, shutdown-day), 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.

The following is a list of FEDERAL holidays in effect during SFY2020:

(All holidays are on Monday, except where noted.)

July 4, 2019	Independence Day (Thursday)	Dec. 25, 2019	Christmas Day (Wednesday)
Sept. 2, 2019	Labor Day	Jan. 1, 2020	New Year's Day (Wednesday)
Oct. 14, 2019	Columbus Day	Jan. 20, 2020	Martin L. King Jr. Day
Nov. 11, 2019	Veterans Day (Friday)	Feb. 17, 2020	Presidents' Day
Nov. 28, 2019	Thanksgiving Day (Thursday)	May 25, 2020	Memorial Day

- 6.1.4 Estimates and Reconciliation of Estimates: Where estimated expenditures are used, program personnel should document procedures outlining the creation and maintenance of these estimates. Step by step, auditable records documenting estimations should be available upon request. Estimates must also be reconciled to actual expenditures on a regular basis and as soon as possible after they are known. Several programs in Vermont's 2020 TSA use estimates.
- 6.1.5 Supplemental Awards: Although not found in the federal CMIA regulations themselves, federal guidance has been issued pertaining to supplemental awards for specific programs. This guidance is standard language found in each state's TSA. Specifically, mention of supplemental awards can be found for the following programs covered (or sometimes covered) in Vermont's TSA:

- 93.778 – Medical Assistance Program
- 93.558 – TANF
- 93.575 – Child Care and Development Block Grant
- 93.658 – Foster Care/93.659 – Adoption Assistance

Section 6.1.5 of the TSA states: *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.*

Medical Assistance:

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.

TANF, CCDF, CSE & FC/AA:

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 the policies in this section as they pertain to the Medicaid Program can be provided by the Boston Regional Office of CMS, U.S. Department of Health & Human Services. Additional guidance can be obtained for the other programs mentioned in section 6.1.5 from the U.S. Department of Health & Human Services, Administration for Children and Families, May 19, 2004 letter to State Administrators from the Deputy Assistant Secretary for Administration.

It is important for program managers to understand and follow the rules regarding the timing, justification, submittal, and approval of the various supplemental awards found in this section in the TSA. Failing to understand and follow the guidelines in these areas could result in a loss or delay of federal reimbursement without federal interest liability.

6.2 Description of Funding Techniques

Funding techniques are split into two major categories: standard techniques provided by the BFS for use by all states and state-specific techniques. Vermont also uses techniques in the “Miscellaneous” category (section 6.2.3) which are another type of standard technique provided by BFS. These are often specific to a designated program. State-specific techniques must conform to standards set by BFS as to form and content.

All techniques refer to the agency cut-off times specified in Exhibit I. This is a table found in the TSA that lists each federal agency and its specific payment processing cut-off times. It indicates the payment types available (ACH or Fedwire), the daily cut-off time, and the expected settlement date. These cut-off times are updated by BFS annually. Exhibit I can be found in Appendix I of this document.

The following are the techniques used by the State of Vermont in the 2020 TSA:

6.2.1 Standard Funding Techniques

Actual Clearance, ZBA – ACH

Technique: 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 used for programs that make ACH payments to clients or providers. It is used in the following programs: Unemployment Insurance, LIHEAP, and Medicaid.

Expenditures in LIHEAP use the VISION system, Medicaid EFT payments are made by the fiscal agent DXC Technology and Unemployment is paid from a separate bank account managed by the Dept. of Labor. This technique is interest neutral and has a clearance pattern of one day.

Actual Clearance, ZBA – Same Day Payment

Technique: 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 used for programs that make electronic same day payments to clients or providers. It is currently only used in the SNAP EBT program which is administered by the fiscal agent Conduent State & Local Solutions. This technique is interest neutral and has a clearance pattern of zero days.

Average Clearance

Technique: 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. 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 exact amount of that disbursement.

This technique requires a drawdown based on a bank account clearance pattern (See section 7.0). For instance, the average day of clearance for the PATH Account is 2 days. This means that on average, it takes 2 days for a payment issued to clear the State’s bank account. A program using average clearance and making payments from the PATH Account would therefore time its draws so that funds arrive in the State’s bank account 2 days after each disbursement (e.g. Payments made on Tuesday are requested on Wednesday for overnight ACH payment to be deposited in the State of Vermont bank account on Thursday). This technique is typically used for programs that make a single disbursement on a regular basis (such as payroll or monthly payments) rather than programs that make payments daily. It is used by programs incurring expenditures in the PATH, Unemployment Insurance and Vendor bank accounts.

This funding technique is used in the following programs: SNAP, TANF and Unemployment Insurance. This technique is interest neutral and the clearance pattern will vary depending upon the bank account used. (See section 7.0)

6.2.2 Special Administrative Funding Techniques

None

6.2.3 Miscellaneous Funding Techniques

Block Grants Where State Cannot Trace Disbursements

Technique: The State shall request funds such that they are deposited in a State account on the median 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 request for funds shall be the lesser of the annual award divided by 12, or the total amount of Federal funds expected to be paid out for program purposes during the year divided by 12. This funding technique is interest neutral.

This funding technique is used in the following program: TANF for funds transferred from TANF to SSBG.

Reverse Flow Program - SSI

Technique: *In accordance with the terms in Section 9.0 of this Agreement, the Federal Government makes payments on behalf of the State for the Supplemental Security Income (SSI) program, CFDA No. 96.006.*

The federal government (Social Security Administration – SSA) makes payments to SSI beneficiaries on the State’s behalf. In order for these payments to be made timely, the State must transfer funds to SSI by a cutoff date each month. SSI maintains the payment records for this program and calculates interest owed/due each year. This technique is interest neutral, however in reality there is always a small interest amount exchanged due to the timing of the State payment to SSA as compared to the date they issue the payments.

6.2.4 State Specific Techniques

Actuals at Fixed Intervals

Technique: The State will request funds at fixed intervals (daily, weekly, etc.) based on expenditures incurred during the fixed interval period. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of each request shall equal the total actual expenditures posted during the period. The State will not apply a clearance pattern to this funding technique and agrees that no federal interest liability will result, provided that federal funds are available and deposited in accordance with the cut-off times specified in Exhibit I. This funding technique is interest neutral.

This funding technique is new in 2020 and is used by AHS in the SNAP program for daily payments where there are a series of large expenditures incurred in the first week of every month and smaller expenses throughout the month. Draws will fluctuate from daily to weekly, depending upon the week of the month.

Bi-Weekly Actual

Technique: *The State will request funds bi-weekly based on the actual expenditures made during the previous two week period. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of each request shall equal the total expenditures posted during the State's bi-weekly billing cycle. Since these expenditures may be incurred in both the payroll and vendor bank accounts, the State will not apply a clearance pattern to this funding technique and agrees that no federal interest liability will incur using this technique, provided that federal funds are available and deposited in accordance with the cutoff times specified in Exhibit I.*

This technique uses a bi-weekly draw pattern and is applied to programs in the Agency of Education: National School Lunch, Title I, and Special Education.

Payment Schedule-Quarterly Estimates-Other

Technique: *Funds will be requested weekly for deposit on the median day of each week. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the drawdown shall be based on quarterly estimates and shall be requested in equal weekly amounts throughout the quarter for deposit on the median day of each week. Estimates will be reconciled to actual costs approximately 45 days after the end of the quarter. This funding technique is interest neutral.*

This funding technique is used in the Unemployment program for non-payroll administrative costs. This technique uses a quarterly estimate and draws in estimated expenses in equal weekly allotments. This technique is interest neutral and does not use a clearance pattern.

Payment Schedule-Quarterly Estimates-Payroll Cycle

Technique: *Funds will be requested bi-weekly to coincide with the States payroll cycle. The request shall be made in accordance with the appropriate Federal agency cut-off time specified in Exhibit I. The amount of the drawdown shall be based on quarterly estimates and shall be requested in equal amounts each pay period during the quarter to coincide with the State's bi-weekly payroll cycle. Estimates will be reconciled to actual costs approximately 45 days after the end of the quarter. This funding technique is interest neutral.*

This funding technique is used by the Dept. of Labor for the payroll portion of its administrative costs in the Unemployment Insurance program and by AHS for the administrative costs portion of TANF, LIHEAP, and Medicaid where it is difficult to obtain actual expenditures on a daily basis. In place of actual expenditures, draws are based upon quarterly estimates which are drawn down in equal allotments bi-weekly (every payday). When this technique is used, draws must be reconciled to actual expenditures as soon as possible each quarter, ideally within 45 days after the quarter ends. This technique is interest neutral and does not use a clearance pattern.

Prior Month's Actual

Technique: *Funds will be requested monthly for expenditures incurred in the prior month. Expenditures will be determined as soon as possible subsequent to the close of each month and a request for funds will occur as soon as possible thereafter. 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 actual expenditures incurred in the prior month. This funding technique is not interest neutral.*

This funding technique is used by several programs for administrative and programmatic costs that are drawn down based upon actual expenditures for the prior month.

It is used for components of the following programs: Unemployment Insurance and National Guard. It is **not** interest neutral, since the draw is made for expenses incurred in the prior month. It also does not use a clearance pattern since it is on a reimbursement basis.

Weekly Billing Cycle

Technique: *Funds will be requested weekly for expenditures incurred during the States seven day billing cycle. The request shall be made in accordance with the appropriate Federal agency cut-off specified in Exhibit I. The amount of the request shall be the actual sum of expenditures that have been posted during the States billing cycle. This funding technique is not interest neutral.*

This technique uses a weekly draw cycle for AHS programs with numerous transactions occurring on a daily basis. Although the clearance pattern would allow for slightly more frequent draws, for administrative ease, it was decided to draw these programs on a weekly cycle. This technique is also used by the Agency of Transportation in FHWA and FTA programs where a weekly report of expenditure activity is generated by their accounting system and used to determine weekly draw amounts.

This funding technique is used in the following programs: SNAP, TANF, LIHEAP, Medicaid, FTA and FHWA. This technique is **not** interest neutral and does not apply a clearance pattern.

6.3 Application of Funding Techniques to Programs: Each federal program is broken down into one or more components. Each component must be assigned a funding technique in the TSA.

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

6.3.2 Programs

The following is a summary of Exhibit II (found in Appendix II of this document), sorted by funding technique:

Technique	Program Name	Component
Actual Clearance, ZBA - ACH	Low-Income Home Energy Assistance	EFT Fuel Benefit Payments to Providers
	Medical Assistance Program	Buy-in, Payments to Providers- EFT & Payments to Public Managed-Care Organization
	Unemployment Insurance -- Federal Benefit Account	Unemployment Insurance-Federal Electronic Funds
	Unemployment Insurance -- State Benefit Account	Unemployment Insurance-State Electronic Funds
Actual Clearance, ZBA - Same Day Payment	Supplemental Nutrition Assistance Program	EBT
Actuals at Fixed Intervals	Supplemental Nutrition Assistance Program	Daily Payments to Providers/Clients/Grantees (eFunds)
Average Clearance	Supplemental Nutrition Assistance Program	Monthly Payments to Providers/Clients/Grantees
	Temporary Assistance for Needy Families	Monthly Benefit Payments
	Unemployment Insurance -- Federal Benefit Account	Unemployment Insurance-Federal Funds Checks
	Unemployment Insurance -- State Benefit Account	Unemployment Insurance-State Funds- Checks
Bi-Weekly Actual	National School Lunch Program	Grantees
	Special Education -- Grants to States	Direct Administrative Costs, Grantees & Indirect Admin Costs
	Title I Grants to Local Educational Agencies	Direct Administrative Costs, Payments to Grantees and Indirect Admin Costs
Block Grants Where State Cannot Trace Disbursements	Temporary Assistance for Needy Families	TANF Transfer to SSBG
Payment Schedule- Quarterly Estimates- Other	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	Unemployment Insurance-Administration - Other
Payment Schedule- Quarterly Estimates- Payroll Cycle	Low-Income Home Energy Assistance	Administrative Costs
	Medical Assistance Program	Administrative Costs, Excluding IAPD and OAPD Costs
	Temporary Assistance for Needy Families	Administration Costs TANF Base
	Unemployment Insurance -- Federal Benefit Account	Unemployment Insurance-Administration - Payroll

Technique	Program Name	Component
Prior Month's Actual	National Guard Military Operations and Maintenance (O&M) Projects	Direct Administrative Costs
	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	Unemployment Insurance - Administration - Other - Special Budget Requests and Administration – Other – TAA Benefits
Reverse Flow Program - SSI (CFDA 96.006)	Supplemental Security Income	SSI
Weekly Billing Cycle	Highway Planning and Construction	Direct Administrative Costs and Payroll & Payments to Providers & Grantees
	Low-Income Home Energy Assistance	Daily Payments to Providers/Clients/Grantee s
	Medical Assistance Program	IAPD and OAPD Administrative Costs
	Public Transportation for Nonurbanized Areas	Direct Administrative Costs and Payroll & Payments to Grantees
	Supplemental Nutrition Assistance Program	Daily Payments to Providers/Clients/Grantees (PATH)
	Temporary Assistance for Needy Families	Daily and Weekly Child Care Payments to Providers/Clients/Grantees (Incl. TANF Transfer)

6.3.3 Materiality Exemptions: Programs may be excluded from the TSA based upon materiality. Vermont does not have any materiality exemptions.

7.0 Clearance Patterns

A clearance pattern is a statistical representation showing the average time it takes a payment to clear a State bank account after the issuance date. It essentially represents how much is cashed and when. Clearance patterns must be updated every five years per CMIA regulations and must be calculated using a period of activity of no less than 90 days. The FHWA clearance pattern was updated using SFY 2015 data for the 2017 TSA. All other clearance patterns were recalculated for the 2020 TSA (see detail below.) See section 7.3 for a schedule showing each bank account and a schedule of when they are next due to be reviewed.

The State Treasurer’s Office and the Department of Finance & Management jointly maintain the clearance patterns for the majority of the State of Vermont’s accounts. The Department of Labor provides the clearance pattern information for the Unemployment Insurance bank account. FHWA clearance data comes from expenditure data in the VISION system and is calculated by the Department of Finance & Management.

Although federal regulations require updates to the clearance patterns every 5 years, they also state that if at any time the State becomes aware that a clearance pattern is no longer valid, it must be revised. When this occurs, the TSA must be revised to reflect the current clearance pattern.

There are five accounts for which clearance patterns must be developed:

Payroll Disbursement Account: This is the account used for all employee payroll payments. Below is a summarized version of the clearance pattern for this account developed in the spring of 2019 using payment data from 10/1/2018 to 12/31/2018. This clearance pattern was effective with the 2020 TSA.

Day After Issuance	% of Dollars Cashed	Amount Cashed
0	.02%	20,829
1	99.27%	86,412,656
2	.00%	2,116
3	.01%	5,489
4	.18%	158,203
5	.16%	136,878
6+	.36%	314,363

Payroll Account

Dollar-Weighted Average Day of Clearance: 1.03 days

Rounded Clearance Pattern: 1 days

Vendor Account: This is the account that pays the vast majority of the State’s vendors. Below is a summarized version of the clearance pattern for this account developed in the spring of 2019 using payment data from 10/1/2018 to 12/31/2018. This clearance pattern was effective with the 2020 TSA.

Day After Issuance	% of Dollars Cashed	Amount Cashed
0	12.45%	166,837,265
1	75.73%	1,015,338,058
2	.25%	3,380,801
3	1.02%	13,684,490
4	1.46%	19,575,733
5	1.82%	24,402,121
6	1.79%	24,061,768
7	1.56%	20,886,211
8	.74%	9,977,960
9	.46%	6,200,591
10+	2.72%	36,382,606

Vendor Account

Dollar-Weighted Average Day of Clearance: 1.7 days

Rounded Clearance Pattern: 2 days

PATH Account: This is an account used exclusively by the Department of Children and Families. This account is used to issue benefit payments to clients in its family services programs such as TANF and SNAP. Below is a summarized version of the clearance pattern for this account developed in the spring of 2019 using payment data from 10/1/2018 to 12/31/2018. This clearance pattern was effective with the 2020 TSA.

Day After Issuance	% of Dollars Cashed	Amount Cashed
0	0.05%	7,699
1	84.97%	14,378,869
2	.16%	27,523
3	.32%	54,389
4	.83%	139,833
5	1.06%	178,617
6	2.55%	432,375
7	2.97%	502,330
8	1.86%	314,052
9	0.90%	153,122
10+	4.33%	734,284

PATH Account

Dollar-Weighted Average Day of Clearance: 2.06 days

Rounded Clearance Pattern: 2 days

Unemployment Compensation Disbursement Account: This is an account used exclusively by the Department of Labor. This account is used to issue benefit payments for the Unemployment Compensation program. Below is a summarized version of the clearance pattern for the Federal Funds portion of the activity in this account developed in the spring of 2019 using payment data from 7/1/2018 to 9/30/2018. This clearance pattern was effective with the 2020 TSA.

Day After Issuance	% of Dollars Cashed	Amount Cashed
0	0%	\$0
1	0%	\$0
2	0%	\$0
3	0%	\$0
4	11.89%	\$1,365
5	17.36%	\$1,992
6	16.73%	\$1,920
7	26.43%	\$3,033
8	8.68%	\$996
9	4.34%	\$498
10+	14.57%	\$1,672

Unemployment Compensation Account

Dollar-Weighted Average Day of Clearance: 7.87 days

Rounded Clearance Pattern: 8 days

(Note: This pattern is for Federal Funds.)

Federal Highway Planning & Construction Program: Expenditures in this program are paid from the Vendor account, but most payments are made electronically and in a pattern different than the average of the vendor account. Below is a summarized version of the clearance pattern for these payments developed in the spring of 2016 using expenditures for the period 7/1/2015 through 12/31/2015. This clearance pattern was effective with the 2017 TSA.

Day After Issuance	% of Dollars Cashed	Amount Cashed
1	0%	0
2	2%	3,017,819
3	7%	10,213,429
4	1%	1,585,652
5	57%	79,945,911
6	15%	21,152,393
7	11%	14,853,235
8	2%	3,004,379
9	1%	1,669,012
10+	3%	4,220,809

Federal Highway Planning & Construction

Dollar-Weighted Average Day of Clearance: 5.82 days

Rounded Clearance Pattern: 6 days

7.2 Clearance patterns for the State of Vermont are developed by the following:

- Vermont State Treasurer
- Vermont Department of Labor
- Vermont Department of Finance & Management

7.3 The clearance patterns were developed using payments issued during the following time periods:

Bank Account	Period Used for Current Pattern	Updated in TSA	Next Update Due
Vendor Account	October-December 2018	2020	2023 Data for 2025 TSA
Payroll Account	October-December 2018	2020	2023 Data for 2025 TSA
PATH Account	October-December 2018	2020	2023 Data for 2025 TSA
FHWA Payments	July – December 2015	2017	2020 Data for 2022 TSA
Unemployment	July-September 2018	2020	2023 Data for 2025 TSA

7.4 The State of Vermont tracked disbursements until at least 99% of the amount of these items were presented for cashing.

7.5 There are three pieces of information the State must identify for each disbursement in the population:

- 1.) Date of check issue/disbursement
- 2.) Date debited from State Account
- 3.) Amount of payment

7.6 Method of calculating the dollar-weighted average day of clearance:

1. 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.

2. 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.
3. 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.
4. 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 did not exclude EFT/Direct Deposit payments in its clearance pattern calculations.

7.8 Each of the State's clearance patterns is calculated in calendar days, not business days. This should be kept in mind when scheduling drawdown requests. A drawdown due on Saturday may be scheduled for Friday deposit and a drawdown due on Sunday should be scheduled for Monday deposit per the regulations.

7.9 At least every five years the Department of Finance & Management must make sure its clearance patterns are recalculated. This will ensure current data will be used when drawing federal funds.

7.10 The State must ensure that all clearance patterns reflect their assigned program's clearance activity. If at any time the State determines that a clearance pattern does not accurately reflect a program's disbursement activity, the clearance pattern must be revised and the TSA updated.

8.0 Interest Calculation Methodology

Annually, F&M calculates the net interest liability owed to/from the Federal government for all programs covered in the TSA. This is called the annual interest report. This report must be submitted electronically by the CMLA Coordinator to BFS by December 31 of each year. The report is reviewed by BFS and an exchange of the net amount of interest owed from or due to the State of Vermont must occur by March 31 each year. The TSA specifies the techniques to be used to calculate the federal and state interest liabilities separately. In practice, F&M calculates net interest amounts for each program which results in a net interest due to/from the Federal government. In addition, the cost of calculating interest and maintaining clearance patterns are allowable costs which may be reported on the annual interest report. (See Paragraph 10-Interest Calculation Costs.)

8.1.1 When carried out properly, no interest-neutral funding techniques in the State of Vermont's TSA will generate an interest liability for either the State or the Federal government. However, in actual practice some amount of interest is exchanged each year. The most common reasons for federal interest liabilities are the late issuance of grant awards and system unavailability. The most common reason for state interest liabilities is human error.

Vermont's TSA currently contains two non-interest neutral funding techniques. The Weekly Billing Cycle funding and the Prior Month's Actual funding techniques are both not interest neutral. They are likely to generate interest liabilities due to their methodology.

8.1.2 The State (each agency) 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 When Federal Interest Liabilities will accrue: *A Federal interest liability shall accrue from the day the State pays out its own funds for program purposes to the date 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.*

Therefore, federal liabilities (interest owed to the State) occur when payments are made from a State bank account prior to receiving Federal funds. However, the State will not collect a federal interest liability if it purposely decides to delay its drawdowns. Requests for funds must occur in a timely manner. If funds are not received according to the schedule on Exhibit I, this should be documented and reported to F&M for inclusion in the annual interest report. In the case of the FHWA program, if it is not billed at least weekly, federal interest liabilities will not be honored. In prior years the State has also collected federal interest liabilities caused by the late issuance of grant awards which causes the State to pay out its own funds prior to the availability of federal funds, especially due to federal continuing resolutions.

8.2.2 How the State calculates 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. Conversely, if the State draws funds in earlier than specified in the program's funding technique or in a manner contrary to the appropriate clearance pattern, it may generate an interest liability which is further described in section 8.6.

In practice, the Agency of Human Services, the Military Department and the Department of Labor (for the administrative costs portion of Unemployment Insurance program) maintain interest calculation spreadsheets throughout the year to document draws and interest. These programs use many complex funding techniques or are on a reimbursement basis making it difficult for F&M to accurately track interest using VISION data. These departments submit their spreadsheets to F&M for review and final interest calculation. F&M also reconciles them to the Schedule of Expenditure of Federal Awards (SEFA) report contained in the single audit to verify that they include all federal funds for each program.

AOT provides the expenditure and revenue data from VISION for some its programs to use for the calculation of a daily cash balance. This is because their VISION coding has become complicated and it is not easily extracted from standard queries.

For all other programs, F&M uses VISION query data to generate daily cash balances and reconcile the total of all draws to the SEFA. Daily negative cash balances are reviewed carefully to determine the cause of the negative balance such as being due to a late draw request on the State's part, or if the program is not interest-neutral. F&M communicates with each department when preparing the annual interest report to assist with this analysis. When federal funds are not available due to late issuance of grant awards or system unavailability, departments communicate this to F&M along with documentation supporting the claim for inclusion in the interest report.

8.3 The Unemployment Trust Fund

8.3.1 The UTF will only incur a State liability if the funding techniques are not followed. In such instances, DOL should record such discrepancies so that they can be properly calculated at the end of the year. Since this bank account covers both federally funded and state funded programs, a summary of the bank account balances, interest earned and banking costs must occur each year. This analysis is calculated by the Department of Labor each year and is furnished to F&M for inclusion in the annual interest report.

8.4 Refund Liabilities: The federal regulations give specific requirements for how states must handle refunds.

8.4.1 Refunds in general must be used to offset the subsequent drawdowns. Refunds that are over \$50,000 must be tracked and reported to F&M at the end of the fiscal year for interest calculations. A refund means funds that a State recovers that it previously paid out for Federal assistance program purposes. Refunds include rebates received from third parties.

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

1. Amount of refund
2. Date a refund is credited to a State account (date deposited)
3. Amount & date of scheduled draw w/corresponding expenditures total
4. Amount & date of actual draw (showing reduction by refund amount)

8.4.3 F&M must use the following methodology to calculate interest liabilities on refunds:

1. Date refund is credited to the State's bank account
2. Date of the subsequent deposit of federal funds against which the refund is offset
3. The amount of the refund

8.5 Exemptions: Any exemptions to interest tracking must be stated in the TSA. As described below, exemptions are possible, but must fall within federally-acceptable guidelines.

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. This section does not currently apply to the State of Vermont and no components of any covered program are exempt from CMA guidelines.

8.6 State Interest Liabilities: The following covers all subsections of this part:

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. The term "paid out for program purposes" means the date that the disbursement leaves the State's bank account, which may require the application of a clearance pattern to payment dates.

The following process and methods are used to calculate State interest liabilities:

The process described in Section 8.2 for the calculation of federal interest liabilities is used to calculate state interest liabilities. In most cases, when a positive daily cash balance exists, it is due to human error indicating that the department did not follow the funding technique and a State liability is generated.

9.0 Reverse Flow Programs

Reverse flow programs are programs for which the Federal Government makes payments on behalf of a state. For the State of Vermont, the Supplemental Security Income (SSI) program is considered a reverse flow program.

Section 9.0 of the TSA contains language describing the details of the payment and interest calculation process. All interest calculations are completed by the Social Security Administration and are forwarded to Vermont for inclusion in the annual interest report. This report is usually received by the State of Vermont in early December each year.

10.0 Interest Calculation Costs

State interest calculation costs and the cost to develop clearance patterns offset any state interest liabilities and are reported on the annual interest report. Currently the costs of the Department of Finance & Management are the only costs claimed in this section each year. However, since some individual agencies maintain their own interest calculations, costs associated with this would be

allowable if documented and submitted. If an agency or department that tracks its CMIA activity would like to pursue the future claim of these costs, they should contact the CMIA Coordinator.

- 10.1 The U.S. Department of Treasury reimburses the State of Vermont any costs associated with calculation of interest, and developing and maintaining clearance patterns in support of interest calculations. The State must justify any expenses over \$50,000 but since Vermont's interest calculation costs average less than \$10,000, they have not required justification. Beginning with the 2015 Annual Interest Report, BFS required interest calculation cost documentation to be submitted to them for review.
- 10.2 The State of Vermont expects to incur costs related to the development of clearance patterns and interest calculations only every several years when clearance patterns are up for review and recalculation. For example, since several clearance patterns were updated during 2019 in preparation of the FY2020 TSA, those costs will be claimed on the FY2019 annual interest report.
- 10.3 The State will 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

The authorized officials for Vermont's TSA are named in section 1.0. When the TSA is approved by BFS, the final document is electronically signed by these authorized officials.

Appendix I

Exhibit I - Funds Request and Receipt Times Schedule State of Vermont

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

Appendix II

Exhibit II - State of Vermont 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	Round ed days
10.551	Supplemental Nutrition Assistance Program	AHS-Agency of Human Services	9.21	Monthly Payments to Providers/Clients/Grantees	Average Clearance	2 Days
10.551	Supplemental Nutrition Assistance Program	AHS-Agency of Human Services	73.64	EBT	Actual Clearance, ZBA - Same Day Payment	0 Days
10.551	Supplemental Nutrition Assistance Program	AHS-Agency of Human Services	0.20	Daily Payments to Providers/Clients/Grantees	Weekly Billing Cycle	2 Days
10.551	Supplemental Nutrition Assistance Program	AHS-Agency of Human Services	16.95	Daily Payments to Providers/Clients/Grantees (eFunds)	Actuals at Fixed Intervals	N/A
10.555	National School Lunch Program	AOE-Agency of Education	100.00	Grantees	Bi-Weekly Actual	N/A
12.401	National Guard Military Operations and Maintenance (O&M) Projects	Mil-Department of Military	100.00	Direct Administrative Costs	Prior Month's Actual	N/A
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	DOL-Department of Labor	28.86	Unemployment Insurance - Federal Funds Checks	Average Clearance	8 Days
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	DOL-Department of Labor	60.35	Unemployment Insurance - Federal Electronic Funds	Actual Clearance, ZBA - ACH	1 Day
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	DOL-Department of Labor	5.84	Unemployment Insurance - Administration - Payroll	Payment Schedule-Quarterly Estimates-Payroll Cycle	N/A
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	DOL-Department of Labor	3.14	Unemployment Insurance - Administration - Other - Special Budget Requests	Prior Month's Actual	N/A
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	DOL-Department of Labor	0.35	Unemployment Insurance - Administration - Other - TAA Benefits	Prior Month's Actual	N/A
17.225F	Unemployment Insurance -- Federal Benefit Account and Administrative Costs	DOL-Department of Labor	1.46	Unemployment Insurance - Administration - Other	Payment Schedule-Quarterly Estimates-Other	N/A
17.225S	Unemployment Insurance -- State Benefit Account	DOL-Department of Labor	32.35	Unemployment Insurance-State Funds-Checks	Average Clearance	9 Days
17.225S	Unemployment Insurance -- State Benefit Account	DOL-Department of Labor	67.65	Unemployment Insurance-State Electronic Funds	Actual Clearance, ZBA - ACH	1 Day

CFDA	Program Name	Recipient	%	Component	Technique	Round ed Days
20.205	Highway Planning and Construction	AOT-Agency of Transportation	18.77	Direct Administrative Costs and Payroll	Weekly Billing Cycle	6 Days
20.205	Highway Planning and Construction	AOT-Agency of Transportation	81.23	Payments to Providers & Grantees	Weekly Billing Cycle	6 Days
20.509	Public Transportation for Nonurbanized Areas	AOT-Agency of Transportation	3.46	Direct Administrative Costs and Payroll	Weekly Billing Cycle	1 Day
20.509	Public Transportation for Nonurbanized Areas	AOT-Agency of Transportation	96.54	Grantees	Weekly Billing Cycle	2 Days
84.010	Title I Grants to Local Educational Agencies	AOE-Agency of Education	0.30	Indirect Administrative Costs	Bi-Weekly Actual	N/A
84.010	Title I Grants to Local Educational Agencies	AOE-Agency of Education	97.80	Grantees	Bi-Weekly Actual	N/A
84.010	Title I Grants to Local Educational Agencies	AOE-Agency of Education	1.90	Direct Administrative Costs	Bi-Weekly Actual	N/A
84.027	Special Education -- Grants to States	AOE-Agency of Education	2.00	Indirect Administrative Costs	Bi-Weekly Actual	N/A
84.027	Special Education -- Grants to States	AOE-Agency of Education	11.00	Direct Administrative Costs	Bi-Weekly Actual	N/A
84.027	Special Education -- Grants to States	AOE-Agency of Education	87.00	Grantees	Bi-Weekly Actual	N/A
93.558	Temporary Assistance for Needy Families	AHS-Agency of Human Services	10.09	TANF Transfer to SSBG	Block Grants Where State Cannot Trace Disbursements	N/A
93.558	Temporary Assistance for Needy Families	AHS-Agency of Human Services	9.10	Monthly Benefit Payments	Average Clearance	2 Days
93.558	Temporary Assistance for Needy Families	AHS-Agency of Human Services	41.79	Administration Costs TANF Base	Payment Schedule-Quarterly Estimates-Payroll Cycle	N/A
93.558	Temporary Assistance for Needy Families	AHS-Agency of Human Services	26.80	Daily Child Care Payments to Providers/Clients/Grantees (Incl. TANF Transfer)	Weekly Billing Cycle	2 Days
93.558	Temporary Assistance for Needy Families	AHS-Agency of Human Services	12.22	Weekly Child Care Payments to Providers	Weekly Billing Cycle	2 Days
93.568	Low-Income Home Energy Assistance	AHS-Agency of Human Services	53.78	EFT Fuel Benefit Payments to Providers	Actual Clearance, ZBA - ACH	1 Day
93.568	Low-Income Home Energy Assistance	AHS-Agency of Human Services	22.13	Administrative Costs	Payment Schedule-Quarterly Estimates-Payroll Cycle	N/A
93.568	Low-Income Home Energy Assistance	AHS-Agency of Human Services	24.09	Daily Check/ACH/EFT Payments to Providers/Clients/Grantees	Weekly Billing Cycle	2 Days
93.778	Medical Assistance Program	AHS-Agency of Human Services	1.39	Payments to Providers-EFT	Actual Clearance, ZBA - ACH	1 Day
93.778	Medical Assistance Program	AHS-Agency of Human Services	88.93	Payments to Public Managed-Care Organization	Actual Clearance, ZBA - ACH	1 Day
93.778	Medical Assistance Program	AHS-Agency of Human Services	0.37	Buy-in	Actual Clearance, ZBA - ACH	1 Day
93.778	Medical Assistance Program	AHS-Agency of Human Services	5.61	Administrative Costs, Excluding IAPD and OAPD	Payment Schedule- Quarterly Estimates- Payroll Cycle	N/A
93.778	Medical Assistance Program	AHS-Agency of Human Services	3.70	IAPD and OAPD Administrative Costs	Weekly Billing Cycle	2 Days
96.006	Supplemental Security Income	AHS-Agency of Human Services	100.00	SSI	Reverse Flow Program - SSI (CFDA 96.006)	6 Days