

Comptroller's Directive No. 2-16
Attachment HE-11
Schedule of Cash, Cash Equivalents, and Investments as of June 30

Purpose

This attachment is used to gather uniform financial reporting information for CAFR footnote disclosures required by **GASBS No. 3**, *Deposits with Financial Institutions, Investments (including Repurchase Agreements), and Reverse Repurchase Agreements*, as amended by **GASBS No. 40**, *Deposits and Investment Risk Disclosures*, and **GASBS No. 59**, *Financial Instruments Omnibus*. This attachment is a supplement to the Attachment HE-10. This is similar to the prior year's Attachment HE-11.

GASBS No. 72, *Fair Value Measurement and Application*, is effective for FY 2016 and includes guidance regarding fair value measurements. Certain provisions of **GASBS No. 79**, *Certain External Investment Pools and Pool Participants*, are effective for FY 2016. Refer to **GASBS No. 72** and **GASBS No. 79** to ensure a thorough understanding of the new reporting requirements prior to completing this attachment.

Recommended

It is recommended that each institution obtain copies of **GASBS No. 3**, **GASBS No. 40**, **GASBS No. 59**, **GASBS No. 31**, **GASBS No. 72**, **GASBS No. 79**, and the Implementation Guide No. 2015-1 for better understanding of this attachment.

Applicable institutions

All institutions that are completing Attachment HE-10 that have cash, cash equivalents, and investments not held with the Treasurer of Virginia and/or SNAP individual portfolios must complete this attachment.

Due date

Various*

Note*: There are staggered due dates for this submission as follows:

Staggered due dates	HEI acronyms
September 20	IALR, IEIA, JMU, UMW, NCI, NSU, RU, RHEA, SVHEC, SWVHEC
September 22	CNU, GMU, LU, ODU, VMI, VPI&SU, VSU
September 26	CWM, UVA, VCU, VCCS

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Certification

The **Certification** tab requires all preparers and reviewers to type their name on this form. Please note that there should be a segregation of duties; therefore, the preparer and the reviewer should not be the same individual for any tab. By typing a name, the preparer is certifying that the attachment is complete and accurate; the reviewer is certifying that the attachment has been reviewed and is complete and accurate; the preparer and reviewer are certifying they were not the same individual for any tab; and the preparer and reviewer are certifying they have read and understood the instructions for the attachment.

Submission requirements

Contact DOA if the institution has any problems with the files.

After downloading the Excel file, rename the file using the institution's acronym followed by Attachment HE-11. For example, VCCS should rename the Attachment HE-11.xlsx* file as VCCS Attachment HE-11.xlsx*.

Please include the **Institution's Acronym** and **Attachment Number** in the **subject line** of the submission e-mail.

Submit the Excel file electronically to Finrept-HE@doa.virginia.gov.

Copy APA via e-mail to APAFinRept@apa.virginia.gov.

Do not submit paper copies of this spreadsheet.

Note*: If the institution has an earlier version of Excel and has problems opening the file, DOA can provide the attachment saved in an earlier version of Excel (.xls).

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**Errors
discovered after
submission**

HEIs must ensure that all efforts have been made to submit a complete and accurate Attachment HE-11. However, if the HEI discovers an unexpected error and attachment revisions are made subsequent to DOA acknowledgement of receipt and acceptance of the original attachment submission, **resubmit the revised attachment AND complete the [Revision Control Log](#) tab in the Excel file attachment.**

Enter the revision date, applicable Excel file tab name, row number and column letter revised, and the previous and revised information. Document text changes and numerical changes. Only enter changes for amounts actually keyed. For example, if a non-keyed, calculated total changes as a result of the revision, this does not need to be documented on the Revision Control Log.

If the attachment is revised more than once, do not delete control log revision information from the previous revision. Enter the new revision date and the additional revisions in the rows following the initial revision rows. This log should document all revisions from the initial attachment submission.

Include “**REVISED – date**” in the **subject line** of the submission e-mail as well as in the **file name**. Resubmit the revised attachment; and ensure that the [Revision Control Log](#) tab has been completed.

Each time a revision is submitted the [Certification](#) tab should be updated with new signatures and dates.

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As defined

Cash – The standard medium of exchange (paper currency) that must be readily available for the payment of current obligations, and it must be free from any contractual restriction that limits its use in satisfying debts.

Cash Equivalents – Instruments or investments of such high liquidity (original maturity of 90 days or less) and low risk that they are virtually as good as cash. Examples are a money market fund, Treasury bill, and monies in the State Non-Arbitrage Program (SNAP) fund*, and the Local Government Investment Pool. Whether an asset is a cash equivalent is determined only once based on the length of the original maturity when the asset is first acquired.

Investments – Securities and other assets that are a) held primarily for the purpose of obtaining income or profit and b) have present service capacity based solely on its ability to generate cash or to be sold to generate cash with an original maturity greater than 90 days. This includes securities, which are transferable financial instruments that evidence ownership or creditorship.

Security – Generally, an instrument evidencing debt of or equity in a common enterprise in which a person invests on the expectation of financial gain. The term includes notes, stocks, bonds, debentures or other forms of negotiable and nonnegotiable evidences of indebtedness or ownership.

Note*: SNAP Individual Portfolios may include cash equivalents and/or investments depending on what makes up the portfolio. This is why there is a Restricted SNAP Individual Portfolio – cash equivalent and a Restricted SNAP Individual Portfolio – investment line item.

Note: The definition of fair value was revised by **GASBS No. 72** as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

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Directions for the “Detail” tab Below are instructions as to the proper completion of the **Detail** tab in the Excel Attachment HE-11. Please follow these instructions carefully.

Part	Instruction
1a	<p>Report the institution’s total cash not held with the Treasurer of VA. <i>This amount must include restricted cash not with the Treasurer of VA and it must agree to the total of Attachment HE-10, Tab 1A, Part 2.</i></p> <p>Note: Certificates of deposit (CDs) should NOT be reported as cash. Prior year’s guidance for reporting certificates of deposits has been revised because certain prior year questions were not included in the Implementation Guide No. 2015-1. The following new guidance is provided based on questions 1.11.1 and 1.26.1 in the Implementation Guide No. 2015-1: For reporting on the financial statement template:</p> <ul style="list-style-type: none"> • Nonnegotiable and negotiable CDs should be reported on the applicable “cash equivalents” financial statement template line item if the original maturity is 90 days or less and they should be reported on the applicable “investment” financial statement template line item if the original maturity is greater than 90 days. <p>For GASBS 3/40 disclosures:</p> <ul style="list-style-type: none"> • Nonnegotiable CDs should be treated as “deposits” and included in the Detail tab to obtain deposit disclosures. • Negotiable CDs should be treated as “investments” and included in the Cash Equiv. & Inv. Not w Tr tab to obtain investment GASBS 3/40 disclosures. <p>Note: Funds held in money-market accounts offered by financial institutions (i.e., banks, savings and loan associations, and credit unions) which are similar to demand deposits versus a broker/dealer (any individual or firm in the business of buying and selling securities for itself and others; broker/dealers must register with the SEC) qualify as deposits, and therefore are classified as cash instead of investments.</p>
1b	For the total cash not held with the Treasurer of VA reported above, provide the total balances of all accounts as reported by the financial institutions where the funds are on deposit as of June 30.
1c	Provide an explanation if the reported amount is negative.
1.1a	Report the institution’s nonnegotiable CDs not held with the Treasurer of VA. <i>These amounts must include restricted nonnegotiable CDs not with the Treasurer of VA.</i>
1.1b	For the nonnegotiable CDs not held with the Treasurer of VA reported above, provide the total balances of all accounts as reported by the financial institutions where the funds are on deposit as of June 30.
1.2	Sums the amounts in Part 1b plus Part 1.1b. No action necessary.

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Directions for the “Detail” tab, continued

Part	Instruction
2a	Of the amount reported in Part 1.2, provide the amount that is insured by the federal depository insurance. The FDIC coverage for public units is as follows: 1) Up to \$250,000 for the combined amount of all time and savings accounts (including NOW accounts) and up to \$250,000 for all demand deposit accounts (interest-bearing and non-interest bearing) per in-state financial institution, and 2) Up to \$250,000 for the combined total of all deposit accounts per out-of-state financial institution. Refer to the FDIC website at http://www.fdic.gov/ for FDIC coverage information and definitions.
2b	Of the amount reported in Part 1.2, provide the amount that is covered by the Security for Public Deposits Act (Section 2.2-4400 of the <i>Code of Virginia</i>). The amount covered is usually the amount deposited in a qualified public depository less the amount covered by federal deposit insurance. The most current listing of qualified depositories is available on the Department of Treasury’s website at http://www.trs.virginia.gov/ . An institution can also contact the SPDA accountant at (804) 371-7987 to determine if their chosen financial institution has become a qualified public depository since the last update. Note: If all cash and nonnegotiable CDs not held with the Treasurer of Virginia are included in Part 2a and Part 2b, do not complete Part 2c. If not, the remaining amount should be classified in Part 2c.
2c	If any cash and nonnegotiable CDs NOT held with the Treasurer of Virginia are NOT covered by the FDIC or the Security for Public Deposits Act, provide the amount reported in Part 1.2 for all applicable options below: <ul style="list-style-type: none"> i) Uncollateralized ii) Collateralized with securities held by the pledging financial institution iii) Collateralized with securities held by the pledging financial institution’s trust department or agent but not in the depositor-government’s name. <p>The total of the amounts provided must agree to the total amount in Part 1.2.</p>
2d	Provide an explanation if the amount reported in Part 2a is greater than \$250,000.
3	Report the amount of cash equivalents and investments NOT held with the Treasurer of Virginia and restricted SNAP Individual Portfolio amounts, excluding nonnegotiable CDs reported in Part 1.1. This amount must include restricted cash equivalents and investments not held with the Treasurer of Virginia, excluding nonnegotiable CDs reported in Part 1.1, and it must agree to the total of Attachment HE-10, Tab 1A, Part 3. Note: <u>This amount should also agree to the sum of all amounts in the “Reported Amount” column on the Cash Equiv. & Inv. Not w Tr tab of the spreadsheet.</u>

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Directions for the “Detail” tab, continued

Part	Instruction
4	<p>List the total fair value of cash equivalents/investments not held with the Treasurer of Virginia (including restricted amounts) and restricted SNAP Individual Portfolio amounts subject to foreign exchange risk. Foreign exchange risk is the risk of an investment’s value changing due to changes in currency exchange rates and/or the risk that an investor will have to close out a long or short position in a foreign currency at a loss due to adverse movements in exchange rates.</p> <p>In addition, list the total deposit amounts included in cash not held with the Treasurer of Virginia (including restricted amounts) subject to foreign exchange risk.</p> <p>The total of fair value of cash equivalents/investments not held with the Treasurer of Virginia (including restricted amounts) plus deposit amounts subject to foreign exchange risk must equal the total of the amount in the Foreign Currency Inv tab of the spreadsheet.</p>
5a	<p>If the sum of cash equivalents not held with the Treasurer of Virginia (including restricted amount) and Restricted SNAP Individual Portfolio - Cash Equivalent amounts on Attachment HE-10 Tab 1A Part 3 is greater than the sum of Less Than 1 year on Cash Equiv. & Inv. Not w Tr. Tab, DOA may contact the institution to obtain an explanation.</p>
5b	<p>Indicate if nonnegotiable CDs not held with the Treasurer of VA are properly reported on the Attachment HE-10’s FST tab on an applicable cash equivalent, restricted cash equivalent, investment, or restricted investment FST line item depending on the length of maturity. An explanation must be provided if the answer is “no” and DOA may contact you for additional information.</p>
5c	<p>The information on Cash Equiv. & Inv. Not w Tr. tab should agree to the agency's individually published financial statements. Any differences must be explained.</p>

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Directions for the “Detail” tab, continued

Part	Instruction
6	<p>Are any of the institution's cash equivalents or investments not held with the Treasurer of VA (including restricted amounts) and restricted SNAP Individual Portfolio amounts in debt securities highly sensitive to interest rate changes? Some examples of these include a variable-rate investment with a multiplier, or a variable-rate investment with a coupon that varies inversely with a benchmark index. For further explanations of highly sensitive investments, refer to the Implementation Guide No. 2015-1.</p> <p>If the institution marked a “Yes”, please provide an explanation as to why these investments are highly sensitive.</p>
7	<p>GASBS No. 40 states it is the institution’s responsibility “to update the custodial credit risk disclosure requirements addressing other common risks of the deposits and investments of state and local governments.” With this in mind, please provide a description of any other type of risk to cash, cash equivalents, and investments not covered elsewhere on this attachment.</p>
8	<p>Submit the institution’s investment policy along with this attachment in the e-mail to finrept-HE@doa.virginia.gov. This is the investment policy that will officially be on record with the Department of Accounts. If the institution does have cash, cash equivalents, and investments NOT with the Treasurer of Virginia and DOES NOT have an investment policy, please provide an explanation.</p>
9a	<p>Report the total amount for all items that are subject to the reporting requirements of the GASBS No. 72 and are reported using the fair value hierarchy (Level 1, Level 2, and Level 3) on the Attachment HE-10 FST tab for the HEI, net of elimination entries. This amount must agree to the total of Attachment HE-10, Tab 7, Part 27a.</p>
9b	<p>For cash equivalents/investments not held with the Treasurer of Virginia (including restricted amounts) and restricted SNAP Individual Portfolio amounts that are subject to the reporting requirements of the GASBS No. 72 and are reported using the fair value hierarchy (Level 1, Level 2, and Level 3) on the Cash Equiv. & Inv. NOT w Tr tab, provide a general description of these items and valuation techniques used for the fair value measurement for each level.</p> <p>If there is a difference between the total fair value amount using the fair value hierarchy reported in Part 9a and Part 9b, provide an explanation for the difference, including what other Attachment HE-10 FST line items include amounts reported using the fair value hierarchy and the fair value level used to report those amounts, if any.</p>

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Part	Instruction
9c	Report the total amount of all items that are subject to the reporting requirements of the <u>GASBS No. 72</u> and fair value is established and reported using the Net Asset Value (NAV) per Share (or its equivalent) on the Attachment HE-10 FST tab for the HEI, net of elimination entries. This amount must agree to the total of Attachment HE-10, Tab 7, Part 27b.
9d	For cash equivalents/investments not held with the Treasurer of Virginia (including restricted amounts) and restricted SNAP Individual Portfolio amounts that are subject to the reporting requirements of the <u>GASBS No. 72</u> and fair value is established and reported using the Net Asset Value (NAV) per Share (or its equivalent) on the <u>Cash Equiv. & Inv. Not w Tr</u> tab, provide a general description of these items. Additionally, provide required footnote disclosures pursuant to <u>GASBS No. 72</u> in a separate Word document accompanying this attachment. If there is a difference between the total fair value amount using the Net Asset Value (NAV) per Share (or its equivalent) reported in Part 9c and Part 9d, provide an explanation for the difference, including what other Attachment HE-10 FST line items include amounts reported at Net Asset Value (NAV) per Share (or its equivalent) as permitted by <u>GASBS No. 72</u> , if any.
10	After completing the Detail tab and other applicable tabs, is the following statement correct: There are no "ERROR" messages on the tabs listed below? If no, most likely there is a keying error. Investigate and make corrections as deemed necessary. (see Note A) -Detail -Cash Equiv. & Inv. Not w Tr -Foreign Currency Inv Note A: If you discover an "Error" message on any tab that cannot be corrected because of a formula error or you cannot determine why there is an "Error" message, contact DOA.
11	After completing the Detail tab and other applicable tabs, does information reported in this attachment seem reasonable when compared to the prior year's Attachment HE-11 submission? (Note: An example of unreasonableness would be if there are significant differences between information in this year's Attachment HE-11 as compared to last year's Attachment HE-11 that cannot be explained. This could be an indication that corrections may be needed.)

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**Directions for
the “Cash
Equiv. & Inv.
NOT w Tr” tab**

Institutions that have cash equivalents/investments not held with the Treasurer of Virginia (including restricted amounts) and restricted SNAP Individual Portfolio amounts will need to report more detailed information about the risk of their cash equivalents and investments. This spreadsheet requests the necessary information DOA needs to properly report in the CAFR to comply with GASBS No. 40.

The **Cash Equiv & Inv. Not w Tr** tab is not password-protected so that institutions may add additional rows when needed without having to contact DOA or may copy and paste information into the sheet from their own records. In adding rows or copying information, care must be taken to preserve the existing spreadsheet layout and column and row labels. If rows are added, please also copy the “TYPE” and “INVESTMENT” descriptions at columns A and B and the formulas at columns N, U, V, and W.

List cash equivalent or investment by type (Debt or Equity) and investment category:

Sections are provided for common investment types and categories. If a category for a specific investment is not provided, place it in the Other Debt Securities or Other Equities Securities section, as appropriate. Specify the issuer of the investment in the Description field. The individual investment issue must also be identified. For equity investments, the issue is usually identified by a ticker symbol. For debt investments, the issue is identified by a CUSIP number. Agencies must provide ticker symbol or CUSIP number information for all investments. This information is needed in order to satisfy the concentration of credit risk disclosure requirement of GASBS No. 40.

Note: **Ginnie Mae, EXIMBANK, and SBA** are the only asset-backed securities that should be included with U.S. Treasury and Agency Securities. This is because they are explicitly backed by the U.S. Government. Securities such as those issued by the **Federal National Mortgage Association (FNMA or Fannie Mae), Student Loan Marketing Corporation (Sallie Mae), and the Federal Farm Credit Banks** are **NOT** explicitly backed by the U.S. Government and should not be included in U.S. Treasury and Agency Securities.

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(continued)**

Note: Care should be taken when identifying securities as asset-backed. Only securities that are collateralized by other assets, such as mortgage or other consumer loans, should be categorized as asset-backed. Although entities such as Fannie Mae and Freddie Mac (Federal Home Loan Mortgage Corporation or FHLMC) issue many asset-backed securities, they also issue unsecured debt in the form of bonds and notes. These unsecured debt issues should be listed in the “Agency Unsecured Bonds and Notes” section of the **Cash Equiv. & Inv. Not w Tr** tab and **NOT** in the “Asset-Backed Securities” section. If there is doubt as to whether a security is asset-backed, this information can be obtained from a variety of sources, including the investment prospectus, the issuer, credit rating agencies or the financial institution that processed the purchase transaction. For example, a search of the investment by CUSIP number at the website of the credit rating agency, Moody’s, www.moodys.com, will indicate whether the debt instrument is unsecured or collateralized by some type of asset.

Example: For the cash equivalent or investment type “Common and Preferred Stocks,” the institution would list each issuer such as General Electric Corp. The institution would also list their ticker symbol “GE”. Because it is an equity security, no credit quality rating would need to be given. The institution would then classify the custodial rate risk for this security.

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(continued)**

Credit Quality Rating (AAA, BB, Unrated, etc.):

List the applicable credit quality rating. The credit quality ratings of cash equivalents and investments in debt securities (corporate bonds, corporate notes, etc) as described by nationally recognized statistical rating organizations (rating institutions) must be disclosed.

Obligations of the U.S. government or obligations **explicitly** guaranteed by the U.S. government are not considered to have credit risk and do not require disclosure of credit quality. Repurchase agreements are exempt from credit quality ratings **only** if the underlying security is explicitly guaranteed by the U.S. government. The credit quality ratings of external investment pools, money market funds, bond mutual funds, and other pooled investments of fixed-income securities should be disclosed. **If a credit quality disclosure is required and the investment is unrated or not rated by any rating agency, the disclosure should indicate that fact that the investment is Unrated. Under no circumstance, should the rating information for any investment be left blank.**

DOA’s rating drop down list in the **Cash Equiv. & Inv. NOT w Tr** tab provides standardized symbols for commonly used ratings of Standard & Poor’s, Moody’s and Fitch’s. Agencies may also refer to these three rating agencies’ websites for explanations of the ratings and the standardized rating symbols. Once a rating agency is selected for the investment, the list of rating symbols that may be selected in the next column is restricted to only valid ratings symbols for that rating agency. If there is no rating agency for the investment, “N/A” may be selected for both the rating agency and the rating.

Interest rate risk (i.e. maturity) of each cash equivalent and investment:

The interest rate risk of debt investments must be disclosed by investment type and amount. DOA has selected the segmented time distribution method as outlined in **GASBS No. 40**. This requirement will require the institutions provide, by amount and issuer, the maturity of their debt investments.

GASBS No. 40 does not require separate disclosure for cash equivalents and investments. Therefore, cash equivalent and investment amounts would be listed in one of the investment column maturities (less than 1 year, 1-5 years, 6-10 years, greater than 10 years) depending on the investment securities that have maturities. Most equity type investments do not have a maturity and their total would only be reported in the “category 3” and/or “uncategorized” columns in the custodial credit risk section.

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(continued)**

Custodial credit risk:

Per **GASBS No. 40**, the requirement to disclose cash equivalents and investments as categories 1 and 2 is not necessary. These amounts should be reported in the uncategorized column. If the security, however, meets the following criteria, the security must still be reported as Category 3.

- Uninsured,
- Not registered in the name of the government, and
- Are held by either the counterparty or the counterparty’s trust department or agent

Note: Investments in external investment pools and in open-end mutual funds are not exposed to custodial credit risk because their existence is not evidenced by securities that exist in physical or book entry form. Securities underlying reverse repurchase agreements are not exposed because they are held by the buyer-lender.

List the total custodial credit risk that is considered category 3 and the amount that is uncategorized (remaining amount) for each issuer. For debt securities, the total of these two columns should equal the sum of the interest rate risk columns mentioned above or an error message will appear. Equity securities (common, preferred stock, index funds, equity index and pooled funds, and real estate) will not have a maturity, and their total would only be reported in the custodial credit risk section.

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Total Reported Amount:

The reported amount column will automatically total from the amounts listed as category 3 and uncategorized in the custodial credit risk columns of the spreadsheet. **An “Error” message will appear for debt securities if this amount does not agree to the sum of the interest rate risk amounts entered.** The overall total of category 3 and uncategorized cash equivalents and investments must agree to the amount reported at Part 3 in the **Detail** tab of the spreadsheet. If it does not, an “Error” message will appear in the **Detail** tab.

Reported Amounts at Fair Value:

GASBS No. 72, *Fair Value Measurement and Application*, establishes a framework for measuring fair value. The framework provides a fair value hierarchy that prioritizes inputs of valuation techniques used to determine fair value. Columns have been added to indicate the level of the fair value hierarchy within which the fair value measurements are categorized (Level 1, Level 2, Level 3), or established using Net Asset Value per Share (or its equivalent) per **GASBS No. 72**.

Level 1 inputs are quoted prices (unadjusted) for identical assets or liabilities in active markets that a government can access at the measurement date.

Level 2 inputs are inputs – other than quoted prices included within Level 1 – that are observable for an asset or liability, either directly or indirectly.

Level 3 inputs are unobservable inputs for an asset or liability. The fair value hierarchy gives the highest priority to Level 1 inputs and the lowest priority to Level 3 inputs.

Not applicable to fair value measurement per GASBS No. 72 column: If the reported amount does not represent the fair value amount measured per **GASBS No. 72**, record the reported amount in the Not applicable to fair value measurement per GASBS No. 72 column. Examples of some items that do not represent fair value amounts measured per **GASBS No. 72** are the items 1a to 1f listed on the **Recordation** tab.

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Fair Value Measurement using (per GASBS No. 72) columns: If the reported amount is the fair value amount measured in accordance with GASBS No. 72 using the fair value hierarchy or established using the net asset value per share (or its equivalent), record the fair value amount in the applicable four GASBS No. 72 fair value measurement columns.

The total of the four “Fair Value Measurement using (per GASBS No. 72)” columns plus the “Not applicable to fair value measurement per GASBS No. 72” column should agree to the corresponding Reported Amount column. If it does not, then an “error” message will appear.

Directions for the “Foreign Currency Inv” tab

List the **fair value** of **each** cash equivalent/investment type subject to foreign exchange risk. Foreign exchange risk is the risk of an investment’s value changing due to changes in currency exchange rates and/or the risk that an investor will have to close out a long or short position in a foreign currency at a loss due to adverse movements in exchange rates.

List the deposit amounts subject to foreign exchange risk in the Deposits column.

The total fair value plus deposit amounts must agree to Part 4 in the **Detail** tab.

Directions for the Recordation tab

Complete this tab to ensure cash equivalents and investments reported on the Attachment HE-10 FST tab in the HEI Total Year-End June 30, 2016, column are properly reported in accordance with GASBS No. 31, as amended by GASBS No. 59, GASBS No. 72, and GASBS No. 79. Previously this tab was included in the Attachment HE-10, Financial Statement Template, titled **TAB 1B, GASBS 31 & 52 & 59**.

Note: GASBS No. 72 amended the definitions of fair value and investments and provides guidance regarding the measurement and application of fair value.

GASBS No. 79 amendments include necessary criteria for an external investment pool to measure for financial reporting purposes all investments at amortized cost. If the external investment pool meets the criteria to report all investments at amortized cost and reports all investments at amortized cost, the pool’s participants must also measure their investment in the external investment pool at amortized cost.

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