

Rural Health Care Committee

Briefing Book

Monday, October 28, 2024

3:05 p.m. –3:50 p.m. Eastern Time

Available For Public Use

Universal Service Administrative Company Offices

700 12th Street, N.W., Suite 900

Washington, D.C. 20005

Universal Service Administrative Company Rural Health Care Committee Quarterly Meeting Agenda

Monday, October 28, 2024 3:05 p.m. – 3:50 p.m. Eastern Time USAC Offices 700 12th Street, N.W., Suite 900 Washington, D.C. 20005

		OPEN SESSION Available for Public Use	Estimated Duration in Minutes
Chair	a1.	 Consent Items (each available for discussion upon request): A. Approval of Rural Health Care Committee Meeting Minutes of July 29, 2024 B. Approval of moving all <i>Executive Session</i> items into <i>Executive Session</i> 	5
Mark	a2.	Approval of Rural Health Care Support Mechanism 1st Quarter 2025 Programmatic Budget and Demand Projection for the November 1, 2024, FCC Filing	5
Mark	i1.	Rural Health Care Business Update • Modernization Benefits and Update	15

		INFORMATION ONLY Available for Public Use	Estimated Duration in Minutes
	i2.	Rural Health Care Business Update (Continued)	
		 Q3 2024 Accomplishments 	
Mark		• Q4 2024 Plans	_
		 Roadmap 	
		 Appendix A Rural Health Care Metrics 	
Teleshia	i3.	Information on Five USAC Internal Audit Division Rural Health	
		Care Support Mechanism Beneficiary Audit Report	

		<u>EXECUTIVE SESSION</u> Confidential – <i>Executive Session Recommended</i>	Estimated Duration in Minutes
	i4.	Rural Health Care Business Update (Continued)	
		 Rural Health Care Tribal Support 	
Mark		 Connected Care Pilot Tribal Support 	15
		 Rural Health Care Fraud Risk Assessment Observations 	
		• Rural Health Care Fraud Risk Assessment – Steps Taken	

Next Scheduled USAC Rural Health Care Committee Meeting

Monday, January 27, 2025 USAC Offices, Washington, D.C.

Universal Service Administrative Company Rural Health Care Committee Meeting

ACTION ITEM

Consent Items

Action Requested

The Rural Health Care Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the consent items listed below.

Discussion

The Committee is requested to approve the following items using the consent resolution below:

- A. Committee meeting minutes of July 29, 2024 (see Attachment A)
- **B.** Approval of moving the *Executive Session* items into *Executive Session*:
 - (1) **i4.** Rural Health Care Business Update (Continued). USAC management recommends that this item be discussed in Executive Session because it may involve discussion of specific internal controls or confidential company data or internal rules and procedures concerning the administration of the universal service support mechanisms, where discussion of the matter in open session would result in disclosure of confidential techniques and procedures that would compromise program integrity.

Upon request of a Committee member, any one or more of the above items are available for discussion by the Committee.

Recommended USAC Rural Health Care Committee Action

APPROVAL OF THE FOLLOWING RESOLUTIONS:

RESOLVED, that the Rural Health Care Committee of the USAC Board of Directors hereby approves: (1) the Committee meeting minutes of July 29, 2024; and (2) discussion in *Executive Session* of the item noted above.

ACTION Item #aRHC01 10/28/2024 Attachment A Meeting Minutes of 7/29/2024 Page 1 of 4

UNIVERSAL SERVICE ADMINISTRATIVE COMPANY 700 12th Street, N.W., Suite 900 Washington, D.C. 20005

RURAL HEALTH CARE COMMITTEE MEETING Monday, July 29, 2024

MINUTES1

The quarterly meeting of the Rural Health Care Committee (Committee) of the USAC Board of Directors (Board) was held at USAC's offices in Washington, D.C., on Monday, July 29, 2024. Dr. Kathy Wibberly called the meeting to order at 12:12 p.m. Eastern Time, with a quorum of seven of the eight committee members present:

Fontana, Brent – Vice Chair – *by telephone* Skrivan, Michael Freeman, Sarah Mona Thompson

Sekar, Radha – Chief Executive Officer Wibberly, Dr. Kathy – Chair

Semmler, Kara

Members of the Committee not present:

Waller, Jeff

Other Board members and officers of the corporation present:

Beyerhelm, Chris – Vice President and Chief Administrative Officer Chalk – *by telephone*

Butler, Stephen – Vice President of Shared Services

Buzacott, Alan – Member of the Board

Chalk, Indra – Member of the Board

Davis, Craig – Vice President of Schools and Libraries

Delmar, Teleshia – Vice President of Audit and Assurance

Domenech, Dr. Dan – Member of the Board

Gaither, Victor – Vice President of High Cost

Garber, Michelle – Vice President of Finance, Chief Financial Officer, and Assistant Treasurer

Gregory, Amber – Member of the Board – *by telephone*

Hutchinson, Kyle – Vice President of IT and Chief Information Officer

Mason, Ken – Member of the Board

O'Brien, Tim - Vice President of Lifeline

Polk, Stephanie – Member of the Board – by telephone

¹ Draft resolutions were presented to the Committee prior to the Committee meeting. Where appropriate, non-substantive changes have been made to the resolutions set forth herein to clarify language, or to correct grammatical or spelling errors.

Sanquist, Christine – Member of the Board
Schell, Julie Tritt – Member of the Board
Seifer, Angela – Member of the Board
Sweeney, Mark – Vice President of Rural Health Care
Wade, Joan – Member of the Board
Wein, Olivia – Member of the Board
Williams, Erin – Vice President, General Counsel, and Assistant Secretary

Others present:

<u>NAME</u>	COMPANY
Albert, Blythe	USAC
Allison, Sarah	USAC
Bailey, Macey	USAC
Braxton, Carolyn	USAC
Burgess, Melody	USAC
Claxton, Naomi	USAC
Ellegood, Sheronda	USAC
Estrella, Guilianna – by telephone	USAC
Francisco, Dale	USAC
Goode, Vernell	USAC
Harvey, Casey	Iron Bow
Hung, Jennifer	USAC
James, Christine	USAC
King, Ryan	USAC
Kurisch, Bill	USAC
McCornac, Carolyn	USAC
Morgan, Meredith	USAC
Morning, Kimberly – by telephone	Morgan Lewis
Nuzzo, Patsy	USAC
Santana-Gonzalez, Jeanette	USAC
Schrader, Theresa – by telephone	Broadband Legal Strategies
Walsh, Jeff	USAC
Sadirkhanova, Sabina – by telephone	USAC

OPEN SESSION

All materials from *Open Session* can be found on the USAC website.

- **a1.** Consent Items. Dr. Wibberly presented this item to the Committee.
 - A. Approval of Rural Health Care Committee meeting minutes of April 29, 2024.
 - **B.** Approval of moving one *Executive Session* item into *Executive Session*:

(1) i3 – Rural Health Care Business Update – Rural Health Care System Automation. USAC management recommends that this item be discussed in *Executive Session* because it may involve discussion of *specific internal controls or confidential company data* or *internal rules and procedures* concerning the administration of the universal service support mechanisms, where discussion of the matter in open session would result in *disclosure of confidential techniques and procedures* that would compromise program integrity.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolution:

RESOLVED, that the Rural Health Care Committee of the USAC Board of Directors hereby approves: (1) the Committee meeting minutes of April 29, 2024; and (2) discussion in *Executive Session* of the item noted above.

Approval of Rural Health Care Support Mechanism 4th Quarter 2024 Programmatic Budget and Demand Projection for the August 2, 2024 FCC Filing. Mr. Sweeney presented this item for consideration. The presentation included a written report on USAC management's recommendations for the Rural Health Care Mechanism 4th Quarter 2024 programmatic budget and demand projection for the August 2, 2024 quarterly FCC Filing.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolutions:

RESOLVED, that the USAC Rural Health Care Committee approves a 4th Quarter 2024 Rural Health Care Support Mechanism direct program budget of \$5.07 million; and

RESOLVED FURTHER, that the USAC Rural Health Care Committee directs USAC staff to submit a collection requirement of \$5.07 million for Rural Health Care Support Mechanism administrative costs in the required August 2, 2024, filing to the Federal Communications Commission on behalf of the Committee; and

RESOLVED FURTHER, that the USAC Rural Health Care Committee, having reviewed at its meeting on July 29, 2024, the 4th Quarter 2024 Rural Health Care Support Mechanism demand estimate of \$179.54 million, hereby directs USAC staff to proceed with the required August 2, 2024 filing to the Federal Communications Commission on behalf of the Committee. USAC staff may make adjustments if the total variance for the Rural Health Care Support Mechanism is equal to or less than \$1 million or may seek approval from

the Committee Chair to make adjustments if the total variance is greater than \$1 million, but not more than \$2 million.

- i1. Information on Eight USAC Internal Audit Division Rural Health Care Support Mechanism Beneficiary Audit Reports. This item was provided for information purposes only. No discussion was held. Dr. Wibberly noted that the Rural Health Care Audit Briefing Book would be made public and posted to the USAC website.
- **i2. Rural Health Care Business Update.** Mr. Sweeney presented PowerPoint slides to the Committee covering the following items:
 - Q2 2024 Accomplishments
 - Funding Year Demand Analysis
 - FCC Third Report and Order Update
 - Q3 2024 Program Plans
 - Roadmap
 - Appendix A: Program Metrics

EXECUTIVE SESSION

i3. Rural Health Care Business Update (Continued, if needed). No additional discussion was needed therefore the Committee did not go into Executive Session.

On a motion duly made and seconded, the Committee adjourned at 12:50 p.m. Eastern Time.

/s/ Erin Williams
Assistant Secretary

Universal Service Administrative Company Rural Health Care Committee Meeting

ACTION ITEM

Approval of Rural Health Care Support Mechanism
1st Quarter 2025 Programmatic Budget and Demand Projection for the
November 1, 2024 FCC Filing

Action Requested

The Rural Health Care Committee (Committee) of the USAC Board of Directors (Board) is requested to approve a 1st Quarter 2025 (Q1 2025) programmatic budget and demand projection for the Rural Health Care Support Mechanism for submission to the Federal Communications Commission (FCC) in USAC's November 1, 2024, quarterly filing.

Discussion

On a quarterly basis, USAC is required to submit to the FCC each program's budget¹ and projected demand for the upcoming quarter.²

Funding Requirement

USAC estimates the Q1 2025 funding requirement for the Rural Health Care Support Mechanism as follows:

[Remainder of page is intentionally blank.]

¹ See 47 C.F.R. § 54.715(c).

² See 47 C.F.R. § 54.709(a)(3).

Table A. Program Funding Requirement

		Increase/		
(in millions)	Q4 2024	(Decrease)	Q1 2025	Notes
Steady State:				
Program Funding Requirement	\$167.85	\$0.98	\$168.83	See Note 1
				and Table B
Adjustments	(29.49)	29.49	0.00	See Note 2
New Requirements:				
N/A	0.00	0.00	0.00	
Total Program Funding	\$138.36	\$30.47	\$168.83	
Requirement				
Prior Period Adjustments (difference b	etween proje	ctions and act	uals):	
Billings	\$4.29	(\$3.01)	\$1.28	
Interest Income	0.00	0.00	0.00	
Bad Debt Expense	(1.48)	0.97	(0.51)	
Total Prior Period Adjustments	\$2.81	(\$2.04)	\$0.77	
USAC Administrative Expenses ³	\$8.88	(\$0.98)	\$7.90	See Table D
Total Funding Requirement	\$150.05	\$27.45	\$177.50	_

Note 1: On March 8, 2024, the Commission announced a funding cap for Funding Year 2024 of \$706.93 million.⁴ The Program Funding Requirement represents one quarter of the Funding Year 2024 cap, less USAC administrative costs. *See* Table B below for additional details.

Note 2: The FCC directed USAC to use \$29.49 million of funds available as of July 31, 2024 to reduce required collections for Funding Year 2024 in Q4 2024.

Table B. Funding Year 2024 Program Funding Requirement

	Fund Year	Notes
(in millions)	2024	
Funding Year 2024 Cap	\$706.93	See Note 1
Quarterly Funding Requirement for Funding Year 2024	176.73	
Less USAC Administrative Costs, which are covered	(7.90)	
within the Funding Cap		
Q1 2025 Program Funding Requirement	\$168.83	

Note 3: Table C is an annual schedule updated once a year for the April Board meeting. The table below has been revised to reflect the available carry forward of \$191.06 million as of July 31, 2024. Per FCC guidance, USAC reserved \$81.81 million to satisfy demand above the cap, \$79.76 million in remaining available funds to reduce required collections in Q3 2024, and \$29.49 million to reduce

³ Administrative costs are covered within the funding cap.

⁴ See Wireline Competition Bureau Announces E-Rate and RHC Programs' Inflation-Based Caps for Funding Year 2024, CC Docket No. 02-6, WC Docket No. 02-60, Public Notice, DA 24-229 (2024).

required collections in Q4 2024.

Table C. Funding Year 2024 Available Roll Forward

	Net
(in millions)	Change
Unused Funds	
Remaining Available Funds from Prior Fund Year	\$908.31
Reserved Funds	
a. Pending Applications to Process	(537.48)
b. Unliquidated Obligations (ULOs)	(261.22)
c. Appeals Reserve - USAC Appeals	16.51
d. Appeals Reserve - FCC Appeals	64.94
e. Reserve to Carry Forward	0.00
Total Unused Funds	\$191.06

Based on the projected burn rate, USAC estimates the following Q1 2025 programmatic budget:

Table D. Quarterly Programmatic Budget

Table D. Quarterly Programmatic Budget							
	Q4 2024	Increase/	Q1 2025	Notes			
(in millions)	Budget	(Decrease)	Budget				
Direct Program Costs							
Employee Expenses	\$1.87	(\$0.10)	\$1.77				
Professional Services	0.92	(0.42)	0.50				
General & Administrative	0.00	0.00	0.00	See Note 4			
Total Direct Program Costs	\$2.79	(\$0.52)	\$2.27				
Direct Assigned Costs							
Employee Expenses	\$0.34	\$0.05	\$0.39				
Professional Services	1.70	(0.59)	1.11				
General & Administrative	0.24	(0.03)	0.21	See Note 4			
Total Direct Assigned Costs	\$2.28	(\$0.57)	\$1.71				
Total Direct Program & Direct Assigned Costs	\$5.07	(\$1.09)	\$3.98				
Common Allocated Costs	\$3.81	\$0.11	\$3.92				
Total Programmatic Budget	\$8.88	(\$0.98)	\$7.90				

Note 4: General & Administrative expenses include meetings and conferences and software licenses.

A comparison of actual expenditures to the budget for the nine months ending September 30, 2024 is provided in **Attachment 1.**

Recommendation

USAC management recommends that the Committee approve the Q1 2025 budget and projection of demand as proposed.

Recommended Rural Health Care Committee Actions

APPROVAL OF THE FOLLOWING RESOLUTIONS:

RESOLVED, that the USAC Rural Health Care Committee approves a 1st Quarter 2025 Rural Health Care Support Mechanism direct program budget of \$3.98 million; and

RESOLVED FURTHER, that the USAC Rural Health Care Committee directs USAC staff to submit a collection requirement of \$3.98 million for Rural Health Care Support Mechanism administrative costs in the required November 1, 2024, filing to the Federal Communications Commission on behalf of the Committee; and

RESOLVED FURTHER, that the USAC Rural Health Care Committee, having reviewed at its meeting on October 28, 2024, the 1st Quarter 2025 Rural Health Care Support Mechanism demand estimate of \$177.50 million, hereby directs USAC staff to proceed with the required November 1, 2024 filing to the Federal Communications Commission on behalf of the Committee. USAC staff may make adjustments if the total variance for the Rural Health Care Support Mechanism is equal to or less than \$1 million or may seek approval from the Committee Chair to make adjustments if the total variance is greater than \$1 million, but not more than \$2 million.

ATTACHMENT 1

Rural Health Care Administrative Costs and Headcount

Comparison of Actual Expenditures and Headcount to the Budget for the Nine Months Ending September 30, 2024

	FTE	FTE	FTE	YTD	YTD	
(\$ in millions)	Actual	Budget	Variance	Actual	Budget	Variance
Direct Program Costs						
Employee Expenses	48	51	3	\$5.31	\$5.21	(\$0.10)
Professional Services (Note 5)				1.85	2.58	0.73
General & Administrative (Note 6)				0.01	0.00	(0.01)
Total Direct Program Costs				\$7.17	\$7.79	\$0.62
Direct Assigned Costs						
Employee Expenses	8	7	(1)	\$1.31	\$0.97	(\$0.34)
Professional Services (Note 5)				6.47	5.07	(1.40)
General & Administrative (Note 6)				0.82	0.71	(0.11)
Total Direct Assigned Costs				\$8.60	\$6.75	(\$1.85)
Total Direct Program & Direct Assigned Costs	56	58	2	\$15.77	\$14.54	(\$1.23)
Common Allocated Costs (Note 7)				\$10.58	\$10.91	\$0.33
Total Programmatic Budget				\$26.35	\$25.45	(\$0.90)

- **Note 5:** Direct Program Professional Services include business process outsourcing (BPO) and rates database support. Direct Assigned Professional Services include beneficiary & contribution audit program audits and IT contract labor.
- Note 6: General & Administrative expenses include reference materials and software licenses.
- **Note 7:** Common costs include costs not directly attributable to a program and are allocated based on the Cost Allocation Methodology, which allocates costs based 50% on direct program costs in the prior year and 50% on program demand in the prior year. Actual common allocated costs reflect a reduction for costs allocated to the appropriated programs.



Rural Health Care (RHC) Committee

RHC Business Update

Open Session

October 28, 2024

Agenda

Modernization Benefits and Update

Modernization Vision

- Provide better service to health care providers
- Have a single, secure source of reliable information
- Increase transparency and visibility
- Maintain program integrity
- Prevent waste, fraud, and abuse





Approach

- In 2020, the Rural Healthcare Division (RHC) business assessment included a recommendation to modernize the RHC systems
- Based on the recommendation, the RHC Modernization project was launched in May 2021
- The new RHC Connect system is built on an Appian-based, FISMA-certified government cloud platform, enabling RHC to utilize an enhanced solution proven successful on other USAC program systems with similar functional needs (i.e., Connected Care Pilot, Emergency Connectivity Fund, High-Cost Verification System, Lifeline Form 555, and ACP)
- The first HCF release, Form 462 Intake, was implemented in Nov. 2021
- Subsequently, parts of the HCF program have been moved to the new system in several releases
- The first Telecom release, Form 466 Intake, was implemented in Oct. 2023
- By mid-2025, all functionality from MyPortal will be in RHC Connect

Functionality Implemented to Date

Completed Functionality

- HCF Request for Services
- HCF Funding Requests
- HCF Invoicing
- HCF Post-Commitment Processes
- Telecom Funding Requests
- HCF and Telecom Eligibility
- Telecom Request for Services
- Telecom Invoicing

Upcoming Functionality

- Telecom Post-Commitment Processes
- Appeals

Challenges

- MyPortal was built on old technology that did not easily permit data migration
- HCF Program in MyPortal was largely limited to Form Intake only, requiring full automation of manual processes
- Changes and enhancements were complex due to an older system, data and technology limitations
- HCF and Telecom applications did not have a uniform look and feel or consistent process
- Most data was not stored in the MyPortal system
- Processes and controls were built 15 years ago with less focus on access and security standards
- Connected Care Pilot Program has a smaller population but still requires migration
- PRA approval is required when any changes are made to official FCC Forms

Benefits

- Applicants and Staff can now view all forms, all programs, and the big picture in one central location
- Forms follow a step-by-step approach (like Turbotax) instead of an online version of a paper form
- All information requests are clearly managed with everything tracked in the system, applicants receive reminders and status updates in one location
- Post-commitment activities are now submitted in the system
- Review notes are in the system and keep the history to show every data and status change

- Runtime for tasks like commitment batches is dramatically reduced
- Reliance on back-end fixes is decreasing
- Low code solution reduces the need for coding and hacks
- Pulling information for data requests, such as PQA/Audits, is much easier
- The RHC Program can now run ad-hoc reporting and fraud risk reporting
- All application data is in the Enterprise Data Warehouse







Rural Health Care (RHC) Committee

RHC Business Update

Open Session – Information Only

October 28, 2024

Agenda

- Q3 2024 Accomplishments
- Q4 2024 Program Plans
- Road Map
- Appendix A: Metrics

Q3 2024 Accomplishments

- Funding commitments continued for funding year (FY) 2024, with 79 percent currently committed to the Healthcare Connect Fund (HCF) and 40 percent committed to Telecom
- Released revised FCC Forms 460 and 465 and completed reviews and decisions of eligibility applications whilst maintaining a backlog of less than 30 days
- Released new FCC Form 469 for Telecom Invoicing.
- Completed de-obligation of outstanding Telecom invoices older than FY2019
- Maintained a zero balance of appeals over 90 days
- Conducted 10 planned webinars for both applicants and service providers on topics including Request for Services, Invoicing Best Practices, and Consortium Best Practices

Q4 2024 Program Plans

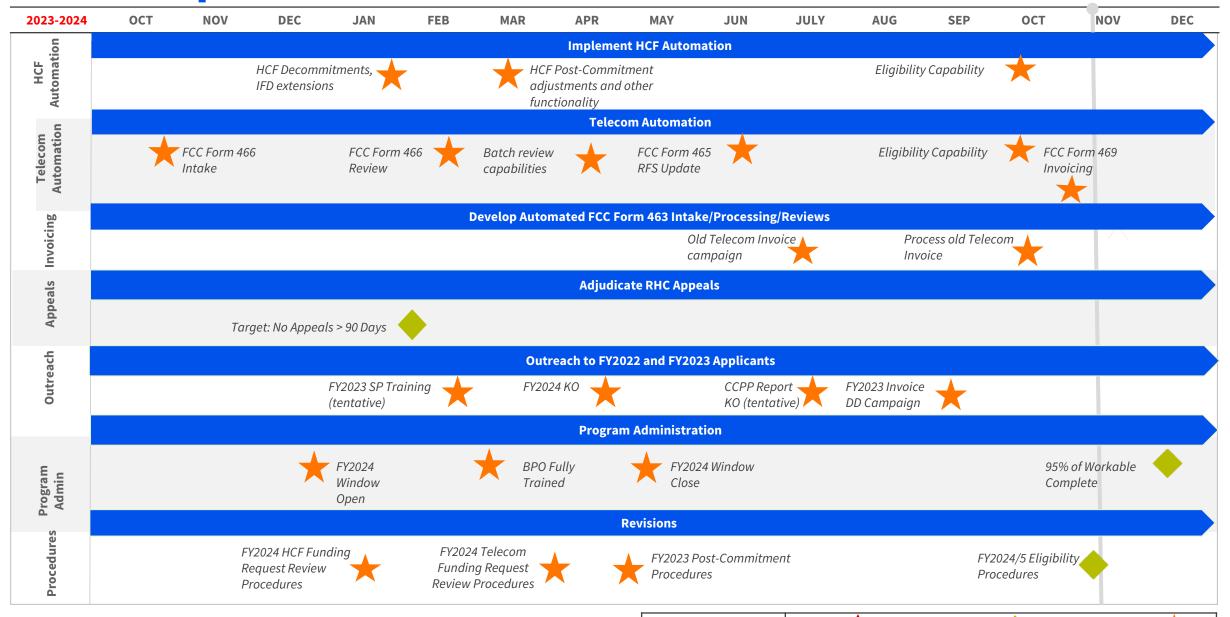
- Continue commitment to FY2024 funding, working towards a target of 95 percent workable complete by year-end
- Open the FY2025 application window on December 1, 2024
- Conduct 11 planned webinars for both applicants and service providers on topics including Requests for Services, New & Revised FCC Forms, Invoicing Best Practices, and Consortium Best Practices

Completed

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On Track

Roadmap



At Risk

Milestone Legend

Appendix A: RHC Program Metrics

RHC HCF Pre-Commitment (Data through September 30, 2024)

Funding Year		Q1	Q2	Q3	Q4	Total	
	2024	Demand	8,399	4,111	9	0	12,519
		Requested Dollars	\$209,113,746	\$285,853,757	\$915,552		\$495,883,055
Requested		Avg. Days Outstanding	218	161	41		
Requ	2023	Demand	8,712	4,156	14	7	12,889
		Requested Dollars	\$155,105,375	\$297,599,543	\$705,139	\$1,433,426	\$454,843,483
		Avg. Days Outstanding	518				
	2024	Reviewed Apps.		3,242	7,327		10,569
Reviewed		Reviewed Dollars		\$31,054,875	\$145,186,169		\$176,229,664
Revie	2023	Reviewed Apps.	3	6,674	4,852	1,006	12,535
		Reviewed Dollars		\$55,644,457	\$81,511,833	\$70,237,637	\$207,393,927

Appendix A: RHC Program Metrics (Continued)

RHC HCF Post-Commitment (Data through September 30, 2024)

Calendar Year		ar	Q1	Q2	Q3	Q4	Total
	2024	Invoice Counts	4,043	2,248	8,501		14,792
itted		Invoice Dollars	\$71,365,724	\$36,787,722	\$105,194,191		\$213,347,637
Submitted	2023	Invoice Counts	2,842	1,869	7,781	3,416	15,908
		Invoice Dollars	\$46, 360,245	\$23,383,121	\$88,577,940	\$50,607,525	\$208,928,831
	2024	Invoice Counts	3,945	2,205	7,520		13,670
ırsed		Invoice Dollars	\$61,081,610	\$26,698,851	\$74,817,642		\$162,598,103
Disbursed	2023	Invoice Counts	2,795	1,811	7,691	3,336	15,633
		Invoice Dollars	\$41,522,931	\$17,431,682	\$82,792,957	\$42,526,360	\$184,273,930

Dollar values displayed have been rounded. Totals are calculated based on the original (not rounded) figures.

Appendix A: RHC Program Metrics (Continued)

RHC Telecom Pre-Commitment (Data through September 30, 2024)

Fund Year		Q1	Q2	Q3	Q4	Total	
	2024	Demand	1,098	753			1,851
		Requested Dollars	\$124,408,560	\$127,226,712			\$251,635,272
Requested		Avg. Days Outstanding		152			
Requ	2023	Demand	767	1,462	-	-	2,229
		Requested Dollars	\$22,512,771	\$239,814,507	-	-	\$262,327,278
		Avg. Days Outstanding		852			
	2024	Reviewed Apps.	-	837	746	435	2,018
Reviewed		Reviewed Dollars	-	\$8,227,809	\$163,308,195	\$81,557,884	\$253,093,888
Revie	2023	Reviewed Apps.	-	4	1,803	372	2,179
		Reviewed Dollars	-	\$1,200	\$243,534,111	\$18,392,210	\$261,927,521

Appendix A: RHC Program Metrics (Continued)

RHC Telecom Post-Commitment (Data through September 30, 2024)

Calendar Year337			Q1	Q2	Q3	Q4	Total
Submitted	2024	Invoice Counts	217	184	310		711
		Invoice Dollars	\$235,363,629	\$226,271,978	\$246,614,678		\$708,250,285
	2023	Invoice Counts	171	133	374	245	923
		Invoice Dollars	\$178,980,697	\$177,687,934	\$235,971,932	\$243,119,652	\$835,760,215
Disbursed	2024	Invoice Counts	217	179	278		674
	2024	Invoice Dollars	\$235,109,092	\$225,314,978	\$245,087,212		\$705,511,282
		Invoice Counts	171	133	374	245	923
		Invoice Dollars	\$178,106,832	\$176,963,756	\$234,612,774	\$242,078,786	\$831,762,148

