

STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT

April 22, 2019

The Honorable Kevin Lembo State Comptroller 55 Elm Street Hartford, Connecticut 06106

Dear Comptroller Lembo:

Section 4-66 of the General Statutes requires that my office provide information on the state's General Fund for Fiscal Year 2019. An analysis of the Special Transportation Fund is also provided here due to the significance of this fund.

General Fund

The adopted budget assumed a \$10.5 million balance from operations. We are projecting an operating surplus of \$566.6 million, up \$70.2 million from last month's forecast largely as a result of revised revenue projections.

Our forecast of the transfer to the Budget Reserve Fund pursuant to the statutory volatility cap is depicted in the table below. We estimate the deposit will be \$848 million in FY 2019, which, when combined with the projected surplus from FY 2019 operations, will increase the state's reserves to about \$2.6 billion by fiscal year-end.

	(in	millions)
BRF Ending Balance - FY 2018	\$	1,185.3
Projected Operating Surplus - FY 2019 (4/22/19 Est.)		566.6
Volatility Cap Deposit - FY 2019 (4/22/19 Est.)		848.0
Estimated BRF Total - FY 2019	\$	2,599.9

As in past years, we anticipate releasing an updated forecast on April 30 after issuance of the consensus revenue estimate required under section 2-36c of the General Statutes, which will contain more complete information regarding Personal Income Tax collections and associated refunds.

Revenues

Projected revenues are up \$103.7 million compared to last month. The largest change is in the withholding component of the Personal Income Tax, up \$100.0 million as a result of continued positive growth. The Corporation Tax has been revised upward by \$20.4 million to reflect stronger than anticipated March payments. These changes are offset by a reduction of \$23.7 million in the Insurance Companies Tax and a reduction of \$10.0 million in the Cigarette Tax. All other revenue changes net to a positive \$17.0 million. The state's new Pass-Through Entity Tax is also performing beyond current estimates and is being revised upward by \$400 million, partially offset by a \$200 million reduction in Estimates and Finals as more revenue than originally budgeted is attributable to pass-through type entities. As a result of the state's volatility cap, this

net additional revenue will be deposited in the Budget Reserve Fund and will have no net impact on the General Fund.

Expenditures

We are projecting net expenditures will, in aggregate, be above the budget plan by \$12.0 million, a change of \$33.5 million from last month's estimate. The change is primarily related to an increase in estimated Adjudicated Claims payments as well as a significant downward revision to the projected lapse in Medicaid. An explanation of lapses and deficiencies follows.

Deficiencies. Projected shortfalls are forecast in the following agencies:

- <u>Department of Administrative Services.</u> A \$900,000 net shortfall is anticipated in the Insurance and Risk Management account.
- Department of Mental Health and Addiction Services. A \$3.9 million deficiency is projected in Personal Services, primarily as a result of overtime and staffing costs at Whiting Forensic Hospital and Connecticut Valley Hospital.
- Office of Early Childhood. A net deficiency of \$9.3 million is projected in the Care4Kids TANF/CCDF account to reflect spending associated with increased federal Child Care Development Fund receipts.
- Department of Correction. A \$36.0 million shortfall is projected. Personal Services is anticipated to have a \$11.3 million deficiency, as the revised FY 2019 appropriation for Personal Services is \$20 million less than actual expenditures for FY 2018. The Other Expenses account will be \$4.7 million over budget, and the Inmate Medical account faces a projected shortfall of \$20.0 million related to the transition of services from the UConn Health Center to in-house and contracted alternatives.
- Department of Children and Families. A net deficiency of \$4.5 million is projected across several accounts. This shortfall is due to (a) honoring the state's commitment to the 2017 Revised Juan F. Exit Plan, which in part requires adequate support for community-based programming to address service needs in order to implement the Exit Plan's outcome measures, (b) costs associated with increasing numbers of children receiving intensive clinical services while residing in foster family homes, (c) maintaining cost-effective services for families involved or at risk of becoming involved with the child protective services system who are also impacted by substance abuse, and (d) the need to support other unanticipated expenses to implement corrective actions at the Solnit Children's Center.

Additionally, we project \$60.0 million in unappropriated expenditures for Adjudicated Claims. Of this amount, \$6.5 million is for a settlement that was delayed from late FY 2018 into FY 2019, and the remainder is for payment of other claims, including those related to settlement of SEBAC v. Rowland.

Lapses. Our projections reflect the amounts currently withheld from agencies to achieve budgeted lapse targets. Additionally, the following amounts are estimated to remain unspent this fiscal year:

- Office of the State Comptroller. A lapse of \$400,000 is expected in Personal Services due to vacancies.
- <u>Department of Revenue Services</u>. A lapse of \$1.1 million is expected in Personal Services due to vacancies.
- Office of Policy and Management. A total of \$3.3 million will lapse, with \$900,000 in the State-Owned PILOT account and \$2.4 million in the Municipal Transition account after all required payments have been made.
- <u>Department of Veterans' Affairs</u>. A \$300,000 lapse is projected in Personal Services due to vacancies.
- Office of the Attorney General. A lapse of \$500,000 is expected in Personal Services due to vacancies.
- Department of Consumer Protection. The Personal Services account will lapse \$450,000 due to vacancies.

- <u>Department of Energy and Environmental Protection</u>. A total of \$400,000 will lapse across a variety of accounts as a result of favorable spending trends.
- <u>Department of Housing</u>. The Housing/Homeless account will lapse \$2.5 million due primarily to a slower than budgeted pace of placements under the Money Follows the Person initiative.
- <u>Department of Public Health</u>. A lapse of \$600,000 is expected in Personal Services due largely to vacancies.
- Office of Health Strategy. A lapse of \$100,000 is expected in Personal Services due to vacancies.
- <u>Department of Developmental Services</u>. A lapse of \$3.0 million is expected in Personal Services due to vacancies.
- <u>Department of Social Services</u>. A net total of \$64.0 million is projected to lapse. Based on expenditure trends, the Medicaid program is expected to end the year \$34.0 million under budget, Personal Services will lapse \$2.0 million, Aid to the Disabled will underspend by \$3.0 million, the Connecticut Home Care Program is projected to lapse \$12.0 million, the Temporary Family Assistance program is expected to lapse \$10.0 million, and the Hospital Supplemental Payments account will lapse \$3.0 million.
- <u>Department of Education</u>. A net total of \$3.7 million is expected to lapse. Personal Services and the Regional Vocational-Technical School System accounts will lapse \$300,000 and \$1.0 million, respectively, due to vacancies. The Commissioner's Network will lapse \$400,000, reflective of final grant awards for approved plans. Based on enrollment estimates and the revocation of Path Academy's charter, the Charter Schools account will lapse \$2.0 million.
- Office of Higher Education. \$400,000 is projected to remain unspent in Personal Services due to vacancies.
- <u>State Comptroller Fringe Benefits</u>. A net lapse of \$25.0 million is anticipated and is attributable
 mainly to lower than anticipated expenditures for Active and Retired State Employee Healthcare as
 well as recoveries in the Higher Education Alternative Retirement System that exceed the level
 assumed in the adopted budget.

Special Transportation Fund

The adopted budget anticipates a \$3.2 million balance from operations. We estimate a \$67.9 million operating surplus, and a \$313.6 million fund balance on June 30, 2019. Projected revenues in the Special Transportation Fund are down \$3.4 million as a result of growing Refunds of Taxes, particularly those related to the Oil Companies Tax. In aggregate, spending is estimated to be \$1.0 million below the level envisioned in the budget plan. Expenditures for the Comptroller's fringe benefits accounts are anticipated to exceed budgeted levels by a net \$1.2 million. Offsetting this shortfall are lapses that exceed the budget plan by \$2.2 million. The Personal Services accounts in the Department of Transportation and the Department of Motor Vehicles will lapse a net total of \$4.0 million and \$3.5 million respectively. A \$5.5 million lapse is projected in the Treasurer's Debt Service account, and DAS' Workers' Compensation Claims account will lapse \$1.2 million.

Other Appropriated Funds

While Sec. 4-66, CGS, does not require that we provide analyses of other appropriated funds, it is worth noting that several industry-funded agencies face potential shortfalls totaling almost \$1.5 million largely because the enacted budget did not include technical adjustments to fringe benefit and indirect overhead appropriations to match the recovery rates established by your office. While some adjustments can be made through the Finance Advisory Committee process, the following deficiencies are expected:

- In the Banking Fund, the <u>Department of Banking</u> is underfunded by a net total of \$299,399 (\$727,302 in Fringe Benefits and \$150,423 in Indirect Overhead, partially offset by a \$578,326 lapse in Personal Services); and
- In the Insurance Fund, the <u>Department of Insurance</u> is underfunded by a net total of \$1,198,990 (a \$1,200,000 shortfall in Fringe Benefits and \$193,891 in Other Expenses, offset by \$194,901 overbudgeted in Indirect Overhead).

Because of the various statutory provisions applicable to the process and timing of industry assessments that support these funds, and given that deficiency appropriations for FY 2019 will likely not be enacted until late in the fiscal year, these shortfalls are not expected to be offset via adjusted assessments; appropriations unmatched by revenue are therefore expected to impact the cumulative balances of these funds.

Please note that the estimates offered by my office during the final quarter of FY 2019 will reflect any changes in the economy, expenditure patterns, and/or other factors that may impact year-end results.

Sincerely,

Melissa McCaw Secretary

State of Connecticut Summary of Changes General Fund and Special Transportation Fund Projected to June 30, 2019 As of March 31, 2019 (In Millions)

General	Fund
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Balance from Operations - Prior Month	\$	496.4
Revenues		
Personal Income Tax - Withholding 100.0)	
Personal Income Tax - Estimates and Finals (200.0))	
Pass-Through Entity Tax 400.0)	
Transfer to BRF - Volatility (200.0	,	
All Other Changes (net) 3.7	<u>7</u>	103.7
Expenditures		
Additional Requirements 2.7	7	
Estimated Lapses (24.2	2)	
Miscellaneous Adjustments/Rounding (12.0	<u>) </u>	(33.5)
Estimated Balance from Operations - June 30, 2019	\$	566.6
Special Transportation Fund Fund Balance as of June 30, 2018	\$	245.7
	•	
Balance from Operations - Prior Month		74.5
Revenues		
Refunds of Taxes (3.4)	4)	
All Other Changes (net) 0.0	<u>) </u>	(3.4)
Expenditures		
Additional Requirements (0.2)	2)	
Estimated Lapses (3.0	0)	
Miscellaneous Adjustments/Rounding 0.0	<u> </u>	(3.2)
Estimated Fund Balance - June 30, 2019	\$	313.6

State of Connecticut General Fund Statement of Revenues, Expenditures, and Results of Operations Projected to June 30, 2019 As of March 31, 2019 (In Millions)

REVENUE	General Assembly Budget Plan ^{1.}	Revised Estimates OPM	Over/ (Under)
Taxes Less: Refunds	\$ 17,202.1 (1,339.8)	\$ 18,321.4 (1,426.9)	\$ 1,119.3 (87.1)
Taxes - Net Other Revenue Other Sources	\$ 15,862.3 1,208.6 1,937.8	\$ 16,894.5 1,242.9 1,439.3	\$ 1,032.2 34.3 (498.5)
TOTAL Revenue	\$ 19,008.7	\$ 19,576.7	\$ 568.0
EXPENDITURES Initial Current Year Appropriations Prior Year Appropriations Continued to FY 2019 ^{2.}	\$ 19,019.7	\$ 19,019.7 125.8	\$ - 125.8
TOTAL Initial and Continued Appropriations Appropriation Adjustments	\$ 19,019.7 -	\$ 19,145.5 -	\$ 125.8 -
TOTAL Adjusted Appropriations	\$ 19,019.7	\$ 19,145.5	\$ 125.8
Net Additional Expenditure Requirements Estimated Appropriations Lapsed Estimated Appropriations to be Continued to FY 2020 ²	(21.5)	54.6 (124.1)	54.6 (102.6)
TOTAL Estimated Expenditures	\$ 18,998.2	\$ 19,075.9	\$ 77.8
Net Change in Fund Balance - Continuing Appropriations Miscellaneous Adjustments/Rounding		(125.8) (60.0)	(125.8) (60.0)
Net Change in Unassigned Fund Balance - 6/30/2019	\$ 10.5	\$ 566.6	\$ 556.0

^{1.} P.A. 18-81 as amended by P.A. 18-49.

^{2.} CGS Sec. 4-89 and other statutory provisions.

State of Connecticut General Fund Revenue Estimates Projected to June 30, 2019 As of March 31, 2019 (In Millions)

		General	F	Revised		
	Assembly			stimates		Over/
	Bu	dget Plan ^{1.}		OPM	(Under)
TAXES						
Personal Income - Withholding	\$	6,147.7	\$	6,578.1	\$	430.4
Personal Income - Estimates and Finals		2,959.9		3,044.8		84.9
Sales and Use		4,153.6		4,290.9		137.3
Corporation		920.2		1,030.0		109.8
Pass-through Entity Tax		600.0		1,000.0		400.0
Public Service Corporations		243.8		230.8		(13.0)
Inheritance and Estate		176.2		196.2		20.0
Insurance Companies		234.3		200.0		(34.3)
Cigarettes		381.0		365.5		(15.5)
Real Estate Conveyance		209.4		209.4		-
Alcoholic Beverages		63.0		64.0		1.0
Admissions and Dues		41.8		42.3		0.5
Health Provider Tax		1,049.2		1,049.2		-
Miscellaneous		22.0		20.2		(1.8)
TOTAL - TAXES	\$	17,202.1	\$	18,321.4	\$	1,119.3
Less: Refunds of Taxes		(1,215.1)		(1,327.3)		(112.2)
Earned Income Tax Credit		(118.3)		(94.2)		24.1
R & D Credit Exchange		(6.4)		(5.4)		1.0
TOTAL - TAXES - NET	\$	15,862.3	\$	16,894.5	\$	1,032.2
OTHER REVENUE						
Transfers - Special Revenue	\$	352.7	\$	357.7	\$	5.0
Indian Gaming Payments	•	203.6	•	255.6	*	52.0
Licenses, Permits, Fees		322.6		292.6		(30.0)
Sales of Commodities and Services		37.7		29.1		(8.6)
Rents, Fines, Escheats		147.2		151.1		3.9
Investment Income		14.5		49.8		35.3
Miscellaneous		189.1		174.1		(15.0)
Refunds of Payments		(58.8)		(67.1)		(8.3)
TOTAL - OTHÉR REVENUE	\$	1,208.6	\$	1,242.9	\$	34.3
OTHER COURCES						
OTHER SOURCES Federal Grants	φ	2 1 1 2 1	φ	2 000 0	φ	(12.6)
	\$	2,112.4 110.2	\$	2,098.8	\$	(13.6)
Transfer from Tobacco Settlement Fund				110.2		-
Transfers From/(To) Other Funds		78.3		78.3		- (40.4.0)
Transfers to BRF - Volatility Adjustment ²	_	(363.1)	_	(848.0)	_	(484.9)
TOTAL - OTHER SOURCES	\$	1,937.8	\$	1,439.3	\$	(498.5)
TOTAL - GENERAL FUND REVENUE	\$	19,008.7	\$	19,576.7	\$	568.0

^{1.} Sec. 27 of P.A. 18-81 as amended by P.A. 18-49. For clarity, OPM has modified this exhibit to separate revenue from the new Pass-through Entity Tax from the Corporation Tax, as the former is a component of the volatility cap.

2. The volatility cap for FY 2019 is \$3,196.8 million. Total revenue from the Estimates and Finals portion of the Personal Income Tax and the Pass-through Entity Tax that exceeds the volatility cap will be deposited into the

Budget Reserve Fund.

State of Connecticut - General Fund Appropriation Adjustments - Net Additional Requirements Projected to June 30, 2019 As of March 31, 2019

Department of Administrative Services	\$ 900,000
Department of Mental Health and Addiction Services	3,900,000
Office of Early Childhood	9,300,000
Department of Correction	36,000,000
Department of Children and Families	4,500,000

Total \$ 54,600,000

State of Connecticut General Fund Estimated Lapses Projected to June 30, 2019 As of March 31, 2019

Unallocated Lapse	\$ 6,391,080
Unallocated Lapse - Judicial	5,000,000
Statewide Hiring Reduction - Executive	7,000,000
Office of the State Comptroller	400,000
Department of Revenue Services	1,100,000
Office of Policy and Management	3,300,000
Department of Veterans' Affairs	300,000
Office fo the Attorney General	500,000
Department of Consumer Protection	450,000
Department of Energy and Environmental Protection	400,000
Department of Housing	2,500,000
Department of Public Health	600,000
Office of Health Strategy	100,000
Department of Developmental Services	3,000,000
Department of Social Services	64,000,000
Department of Education	3,700,000
Office of Higher Education	400,000
OSC - Fringe Benefits	25,000,000
Total	\$ 124,141,080

State of Connecticut FY 2019 General Fund Monthly Summary of Operations (In Millions)

	Budget Plan ^{1.}	July 2018	August 2018	September 2018	October 2018	November 2018	December 2018	January 2019	February 2019	March 2019	April 2019	May 2019	June 2019
REVENUE	\$19,008.7	\$ 19,171.6	\$19,179.2	\$ 19,182.4	\$ 19,269.4	\$ 19,275.9	\$ 19,473.0	\$ 19,473.0	\$19,473.0	\$19,576.7			
Appropriations	19,019.7	19,019.7	19,019.7	19,019.7	19,019.7	19,019.7	19,019.7	19,019.7	19,019.7	19,019.7			
Additional Requirements	0.0	31.5	35.5	54.6	54.6	58.0	61.9	45.3	57.3	54.6			
Less: Estimated Lapses	(21.5)	(27.5)	(60.7)	(76.8)	(79.8)	(84.2)	(110.5)	(148.0)	(148.3)	(124.1)			
TOTAL - Estimated Expenditures	18,998.2	19,023.7	18,994.5	18,997.5	18,994.5	18,993.5	18,971.1	18,917.0	18,928.7	18,950.2	0.0	0.0	0.0
Balance from Operations	10.5	147.9	184.7	184.9	274.9	282.4	501.9	556.0	544.3	626.5	0.0	0.0	0.0
Misc. Adjustments/Rounding	0.0	(10.0)	(15.0)	(15.0)	(20.0)	(40.0)	(40.0)	(39.9)	(47.9)	(59.9)			
Est. Balance from Operations - 6/30/19	\$10.5	\$137.9	\$169.7	\$169.9	\$254.9	\$242.4	\$461.9	\$516.1	\$496.4	\$566.6	\$0.0	\$0.0	\$0.0

^{1.} P.A. 18-81 as amended by P.A. 18-49

State of Connecticut Special Transportation Fund Analysis of Budget Plan Projected to June 30, 2019 As of March 31, 2019 (In Millions)

	General Assembly Budget Plan ^{1.}	Revised Estimates <u>OPM</u>		Over/ <u>Jnder)</u>	
Fund Balance as of June 30, 2018	\$ 224.0	\$ 245.7	\$	21.7	
REVENUE					
Taxes	\$1,227.3	\$1,274.4	\$	47.1	
Less: Refunds of Taxes	(14.6)	(33.0)		(18.4)	
Taxes - Net	1,212.7	1,241.4		28.7	
Other Revenue	407.8	442.8		35.0	
TOTAL - Revenue	\$1,620.5	\$1,684.2	\$	63.7	
EXPENDITURES					
Appropriations	\$ 1,629.3	\$1,629.3	\$	-	
Prior Year Appropriations Continued to FY 2019 2.		28.5		28.5	
TOTAL Initial and Continued Appropriations Appropriation Adjustments	\$ 1,629.3 -	\$1,657.8 <u>-</u>	\$	28.5	
TOTAL Adjusted Appropriations	\$1,629.3	\$1,657.8	\$	28.5	
Net Additional Expenditure Requirements		1.2		1.2	
Estimated Appropriations Lapsed	(12.0)	(14.2)		(2.2)	
Estimated Appropriations to be Continued to FY 2020 ² . TOTAL Estimated Expenditures	\$1,617.3	<u>-</u> \$1,644.8	\$	27.5	
TOTAL Estimated Experialities	ψ 1,017.5	Ψ1,044.0	Ψ	21.5	
Net Change in Fund Balance - Continuing Appropriations Miscellaneous Adjustments/Rounding		(28.5)		(28.5)	
Net Change in Unassigned Fund Balance - FY 2019	\$ 3.2	\$ 67.9	\$	64.7	
Estimated Fund Balance - June 30, 2019	\$ 227.2	\$ 313.6	\$	86.4	

^{1.} P.A. 18-81 as amended by P.A. 18-49.

^{2.} CGS Sec. 4-89 and other statutory provisions.

State of Connecticut Special Transportation Fund Revenue Estimates Projected to June 30, 2019 As of March 31, 2019 (In Millions)

	Α	General ssembly Iget Plan ^{1.}	Revised Estimate OPM	es	Over/ Under)
TAXES Motor Fuels Oil Companies Sales & Use Tax Sales Tax DMV TOTAL - TAXES Less: Refunds of Taxes TOTAL - TAXES - NET	\$	502.3 279.8 358.4 86.8 1,227.3 (14.6) 1,212.7	\$ 509. 312. 367. 85. 1,274. (33. \$1,241.	5 6 2 4 0)	32.7 9.2 (1.6) 47.1 (18.4)
TOTAL - TAXES - NET	Ф	1,212.7	\$1,241.	4 \$	28.7
OTHER REVENUE Motor Vehicle Receipts Licenses, Permits, Fees Interest Income Federal Grants Transfers (To)/From Other Funds Refunds of Payments TOTAL - OTHER REVENUE	\$	250.6 142.8 12.4 12.1 (5.5) (4.6) 407.8	\$ 252. 153. 35. 12. (5. (4. \$ 442.	2 4 1 5) 9)	1.9 10.4 23.0 - (0.3) 35.0
TOTAL - SPECIAL TRANSPORTATION FUND REVENUE	\$	1,620.5	\$1,684.	2 \$	63.7

^{1.} Sec. 28 of P.A. 18-81 as amended by P.A. 18-49.

State of Connecticut Special Transportation Fund Appropriation Adjustments - Net Additional Requirements Projected to June 30, 2019 As of March 31, 2019

OSC - Fringe Benefits \$ 1,200,000

Total \$ 1,200,000

State of Connecticut Special Transportation Fund Estimated Lapses Projected to June 30, 2019 As of March 31, 2019

Unallocated Lapse	\$ -
Department of Motor Vehicles	3,500,000
Department of Transportation	4,000,000
OTT - Debt Service	5,500,000
DAS - Workers' Compensation Claims	1,200,000

Total \$ 14,200,000

State of Connecticut FY 2019 Special Transportation Fund Monthly Summary of Operations (In Millions)

	Budget Plan ^{1.}	July 2018 ^{1.}	August 2018	September 2018	October 2018	November 2018	December 2018	January 2019	February 2019	March 2019	April 2019	May 2019	June 2019
Beginning Balance ^{2.}	\$ 224.0	\$ 224.0	\$ 245.7	\$ 245.7	\$ 245.7	\$ 245.7	\$ 245.7	\$ 245.7	\$ 245.7	\$ 245.7			
Revenue	1,620.5	1,677.3	1,677.3	1,677.3	1,684.6	1,684.6	1,687.6	1,687.6	1,687.6	1,684.2			
Total Available	1,844.5	1,901.3	1,923.0	1,923.0	1,930.3	1,930.3	1,933.3	1,933.3	1,933.3	1,929.9	0.0	0.0	0.0
Appropriations	1,629.3	1,629.3	1,629.3	1,629.3	1,629.3	1,629.3	1,629.3	1,629.3	1,629.3	1,629.3			
Additional Requirements	0.0	0.0	0.0	0.0	0.0	1.0	0.7	1.0	1.0	1.2			
Less: Estimated Lapses	(12.0)	(12.0)	(12.0)	(12.0)	(12.0)	(12.0)	(12.0)	(15.7)	(17.2)	(14.2)			
TOTAL - Estimated Expenditures	1,617.3	1,617.3	1,617.3	1,617.3	1,617.3	1,618.3	1,618.0	1,614.6	1,613.1	1,616.3	0.0	0.0	0.0
Balance from Operations	3.2	60.0	60.0	60.0	67.3	66.3	69.6	73.0	74.5	67.9	0.0	0.0	0.0
Misc. Adjustments/Rounding	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
Estimated Balance 6/30/19	\$227.2	\$284.0	\$305.7	\$305.7	\$313.0	\$312.0	\$315.3	\$318.7	\$320.2	\$313.6	\$0.0	\$0.0	\$0.0

^{1.} P.A. 18-81 as amended by P.A. 18-49.

^{2.} Budget plan and July as estimated by the Office of Policy and Management based on the Comptroller's August 1, 2018 letter. August per communications with the Office of the State Comptroller.