

Appendix 4

**Instructions: CFO Representations for Intra-governmental Activity and Balances Form**

Next to each category on the form below, enter “Yes,” “No,” or “N/A” to indicate whether criteria have been met. Descriptions of expected answers are provided below.

Provide an electronic signed copy of the *CFO Representations for Intra-governmental Activity and Balances Form* along with the completed Intra-governmental Year-End Material Differences Reports I, II, and III to the federal entity’s IG, the Bureau of the Fiscal Service (Fiscal Service) at email address [GovernmentwideIGT@fiscal.treasury.gov](mailto:GovernmentwideIGT@fiscal.treasury.gov), and GAO at email address [USCFS@gao.gov](mailto:USCFS@gao.gov) by the date specified in the Year-End Closing TFM bulletin.

**Note:** For all responses to the intra-governmental issues noted below, describe the area and the extent of any noncompliance with the requirements in a written response on this form or an attachment, if necessary. Fiscal Service may reach out if clarification of a response is needed.

(Refer to the requirements stated in subsection 4750.60, Year-end CFO Procedures for Intra-governmental Transactions/Balances.)

**Section I. General Intra-governmental Reporting Results Instructions**

A. There should be consistency between the federal entity intra-governmental reporting submitted to the Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS) and the federal entity source documents. If there is not consistency, provide an explanation.

B. Federal entities should have policies/procedures to record, process, summarize, and report intra-governmental activity/balances by trading partner. If policies/procedures do not exist, provide an explanation.

C. For any activity reported with FR Entity 0000 (Congress: House and Senate), two separate dollar amounts are required: 1) a dollar amount of the activity that relates to business conducted with the U.S. House of Representatives and 2) a dollar amount of the activity that relates to business conducted with the U.S. Senate.

D. For any activity reported with FR Entity 9999 that is unknown and unidentified, where the federal entity cannot identify their trading partner, provide the dollar amount for the activity where the trading partner is unknown.

E. If a dollar amount was provided in question “D,” the federal entity must explain why the trading partner cannot be identified or is unknown.

F. For any activity reported with trading partner FR Entity 9900 – General Fund of the U.S. Government (General Fund), specify whether the federal entity provided the General Fund with the required data by the specified timeframe per Volume I, Part 2, Chapter 4700, subsection 4735.20g and Appendix 11.

**Note:** Fiscal Service will verify this deliverable with the General Fund.

G. For any required data provided to the General Fund by the specified timeframe per Volume I, Part 2, Chapter 4700, subsection 4735.20g and Appendix 11 mentioned in question “F,” specify whether the amounts provided to the General Fund match what was reported in the federal entity’s audited financial statements. If they do not match, provide an explanation.

H. Review the Intra-governmental Material Differences Reports provided by Fiscal Service in the Intra-governmental Module of GTAS. Federal entities must work with their trading partners to reconcile differences. Specify whether the federal entity contacted their trading partners concerning Part I material differences. If they were not contacted, specify which federal entities were not contacted and provide an explanation.

I. Specify whether the federal entity’s material differences resulted from an internal error. If there was an internal error, a top level journal voucher may need to be completed for the consolidation of the *Financial Report of the U.S. Government*. Specify and provide consent if a journal voucher can be completed.

J. Specify whether the independent auditors proposed any adjustments related to intra-governmental balances at year-end. If so, specify whether any of these adjustments were waived by management and provide an explanation.

K. If the federal entity did not have a CAP that existed for the specific dates, enter N/A. For Corrective Action Plans (CAPs) with targeted completion dates in the current fiscal year, specify whether the federal entity implemented these CAPs. If the CAPs were not implemented, specify whether an Extension Request was submitted or whether the difference was entered into the Dispute Resolution process.

If either of the answers is “yes,” then enter “yes” in the box.

If both answers are “no,” then enter “no” in the box, provide an explanation and include the CAP number.

**Note:** Fiscal Service wants to know if the CAPs were implemented, and/or if federal entities are actively working on CAPs, not if the status updates were completed.

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**Instructions: CFO Representations for  
Intra-governmental Activity and Balances Form**

L. Specify whether the federal entity's CFO reviewed and monitored the Quarterly Intra-governmental Transactions Metrics and Scorecards.  
If they did not, provide an explanation.

M. Specify whether the federal entity has internal controls which include: identifying and properly recording intra-governmental transactions, reconciling and resolving intra-governmental differences with the trading partner, and correctly reporting intra-governmental activity and balances to the Department of the Treasury through GTAS.  
If not, explain why no internal controls exist.

N. Specify if the federal entity's internal controls in the previous question are covered by an A-123 audit or other audit review process.  
If not, provide an explanation.

O. Specify if the federal entity collaborates and engages with trading partners to resolve intra-governmental differences that go beyond Fiscal Services processes. For example, do you collaborate with your trading partners to identify and reconcile transactions below the MDR and TDF thresholds for intra-governmental differences? This would not include collaboration done as a result of a Material Difference Report (MDR), Targeted Difference Form (TDF), or Root Causes Analysis/Corrective Action Plan (CAP). Responses should include federal entity-initiated processes.  
If so, provide an explanation.

P. Specify if the federal entity's A-123 or other review includes internal controls over intra-departmental differences (differences within an entity itself). If intra-departmental differences exist, explain why they were not resolved by year-end.

Q. Specify if the federal entity performs internal controls over intra-governmental transactions and balances that includes properly identifying, recording and reconciling balances prior to reporting in GTAS?  
If not, provide an explanation.

R. Specify whether any intra-governmental differences were noted on the Summary of Uncorrected Misstatements above the federal entity's materiality threshold. If yes, provide a reason for not making the correcting adjustment and state whether the entity will make the correcting entry in the subsequent fiscal year.

<b>Section II. Explanation of Year-End Differences</b>	<b>"Yes," "No," or "N/A"</b>	<b>Explanation</b>
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Specify whether all *Intra-governmental Year-End Material Differences Reports (Parts I, II, and III)* were explained and certified in the Intra-governmental Module in GTAS.  
If they were not, provide an explanation.

**Section III. CFO Confirmation**

By signing the form, the CFO acknowledges their responsibility for maintaining effective internal controls when recording intra-governmental transactions, the reconciliation of intra-governmental differences, communication with related trading partners to resolve intra-governmental differences, and accurate reporting of intra-governmental activity. We confirm that our agency implements and maintains proper and effective internal controls regarding intra-governmental transactions.

*Important:* The CFO, or equivalent, must sign this form, not a designee.  
Return an electronic copy to Fiscal Service and GAO by specified due date.

**Appendix 4**

<p><b>CFO Representations for Intra-governmental Activity and Balances Form</b></p> <p align="center" style="border: 1px solid black; padding: 2px;"><i>Mark in Green Areas Only</i></p>
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<b>Four-Digit FR Entity Code</b>		<b>Fiscal Year</b>	
<b>Federal Entity Name</b>			
<p><b>INSTRUCTIONS:</b> Next to each category enter “Yes,” “No,” or “N/A” to indicate whether criteria have been met. Briefly describe the reasons for exceptions. Provide an electronic signed copy of the <i>CFO Representations for Intra-governmental Activity and Balances</i> along with the completed <i>Intra-governmental Year-End Material Differences Reports I, II, and III</i> to the federal entity’s IG, the Bureau of the Fiscal Service (Fiscal Service) to email address <a href="mailto:GovernmentwideIGT@fiscal.treasury.gov">GovernmentwideIGT@fiscal.treasury.gov</a>, and GAO to email address at <a href="mailto:USCFS@gao.gov">USCFS@gao.gov</a> by the date specified in the Year-end closing TFM bulletin. Also refer to the description of requested answers in pages one and two of the TFM 2-4700, Appendix 4.</p> <p><b>Note:</b> For all responses to the intra-governmental issues below, describe the area and the extent of any noncompliance with the requirements in a written response on this form or an attachment, if necessary. Fiscal Service may reach out if clarification of a response is needed.</p> <p><b>(Refer to the requirements stated in subsection 4750.60, Year-end CFO Procedures for Intra-governmental Transactions/Balances.)</b></p>			

Section I. General Intra-governmental Reporting Results	“Yes,” “No,” or “N/A”	Explanation
A. Is consistency maintained between the federal entity intra-governmental reporting submitted to the Governmentwide Treasury Account Symbol Adjusted Trial Balance System (GTAS) and the federal entity source documents? If “no,” provide an explanation.	<b>A.</b>	
B. Does the federal entity have policies/procedures to record, process, summarize, and report intra-governmental activity/balances by trading partner? If “no,” provide an explanation.	<b>B.</b>	
C. Does the federal entity have activity reported with FR Entity 0000 (Congress: House and Senate)? 1. If “yes,” indicate the dollar amount of this activity that relates to business conducted with the U.S. House of Representatives. 2. If “yes,” indicate the dollar amount of this activity that relates to business conducted with the U.S. Senate.	<b>C.</b>  <b>1.</b>  <b>2.</b>	
D. Does the federal entity have activity reported with FR Entity 9999 (Unknown Trading Partners/Unidentified)? 1. If “yes,” indicate the dollar amount of this activity that relates to truly unidentifiable trading partners.	<b>D.</b>  <b>1.</b>	
E. Does the federal entity have unidentified material differences referenced in question “D”? If “yes,” provide an explanation of why the amounts are unidentified.	<b>E.</b>	
F. Does the federal entity have activity reported with FR Entity 9900 – General Fund of the U.S. Government (General Fund)? 1. If “yes,” did the federal entity provide the General Fund with the required data by the specified timeframe per Volume I, Part 2, Chapter 4700, subsection 4735.20g and Appendix 11? If “no,” provide an explanation.	<b>F.</b>  <b>1.</b>	
G. If the federal entity provided the General Fund with required data by the specified timeframe per Volume I, Part 2, Chapter 4700, subsection 4735.20g and Appendix 11 mentioned in question “F,” did the amounts provided to the General Fund match what was reported in the federal entity’s audited financial statements? If “no,” provide an explanation.	<b>G.</b>	

**Appendix 4**

<b>Section I. General Intra-governmental Reporting Results</b>	<b>“Yes,” “No,” or “N/A”</b>	<b>Explanation</b>
H. Review the Intra-governmental Material Differences Reports provided by Fiscal Service. Were all federal entities contacted or pursued concerning the Part I material differences? If “no,” list those federal entities that were not contacted or pursued and provide an explanation.	H.	
I. Did the federal entity’s material differences result from an internal error? If “yes,” provide details (in the explanation box). 1. If “yes,” does the federal entity consent to a top level journal voucher for the consolidation of the <i>Financial Report of the U.S. Government</i> ?	I. 1.	
J. Did the independent auditors propose any adjustments related to intra-governmental balances reported at year-end? 1. If “yes,” were any of the auditor’s intra-governmental adjustments waived by management? If “yes,” provide an explanation.	J. 1.	
K. If the federal entity did not have a Corrective Action Plan (CAP) that existed for the specific dates enter N/A. If applicable, did the federal entity implement all CAPs which had a targeted completion date in the current fiscal year? If “no,” was an Extension Request submitted or did the difference enter into the Dispute Resolution process? If “no,” provide an explanation.	K. 1.	
L. Did the federal entity’s CFO review and monitor the Quarterly Intra-governmental Transactions Metrics and Scorecards available? If “no,” provide an explanation.	L.	
M. Does the federal entity have internal controls which include: identifying and properly recording intra-governmental transactions, reconciling and resolving intra-governmental differences with the trading partner, and correctly reporting intra-governmental activity and balances by trading partner to the Department of the Treasury through GTAS? If not, explain why.	M.	
N. Are the federal entity’s internal controls in the previous question covered by an A-123 audit or other audit review process? If not, explain why.	N.	
O. Does the federal entity collaborate and engage with trading partners to resolve intra-governmental differences that go beyond Fiscal Services processes? For example, do you collaborate with your trading partners to identify and reconcile transactions below the MDR and TDF thresholds for intra-governmental differences? This would not include collaboration done as a result of a Material Difference Report (MDR), Targeted Difference Form (TDF), or Root Causes Analysis/Corrective Action Plan (CAP). Responses should include federal entity-initiated processes. If so, describe.	O.	
P. Does the federal entity’s A-123 or other review include the assessment of intra-departmental activity? If intra-departmental differences exist, explain why they were not resolved by year-end.	P.	
Q. Does the federal entity perform internal controls over intra-governmental transactions and balances that includes properly identifying, recording and reconciling balances prior to reporting in GTAS? If not, explain why.	Q.	
R. Were any intra-governmental differences listed on the Summary of Uncorrected Misstatements above the federal entity’s materiality threshold? If yes, provide a reason for not making the correcting adjustment and explain whether the intra-governmental difference will be corrected in the subsequent fiscal year.	R.	
<b>Section II. Explanation of Year-End Differences</b>	<b>“Yes,” “No,” or “N/A”</b>	<b>Explanation</b>
Were all <i>Intra-governmental Year-End Material Differences Reports (Parts I, II, and III)</i> explained and certified in GTAS? If “no,” provide an explanation.		

**Appendix 4**

**Section III. CFO Confirmation**

We acknowledge our responsibility for maintaining effective internal controls when recording intra-governmental transactions, the reconciliation of intra-governmental differences, communication with related trading partners to resolve intra-governmental differences, and accurate reporting of intra-governmental activity. We confirm that our agency implements and maintains proper and effective internal controls regarding intra-governmental transactions.

<b>CFO Signature (Not a designee)</b>	<b>Printed CFO Name</b>	<b>Date</b>
<b>CFO Contact Email</b>	<b>CFO Contact Phone Number</b>	