



COUNTY GOVERNMENT OF BUNGOMA

THE COUNTY TREASURY

MEDIUM TERM DEBT MANAGEMENT STRATEGY PAPER FOR

FY 2020/21 – FY 2022/23

FEBRUARY 2020

©2020 County Medium Term Debt Management Strategy Paper (CMTDS)

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ALL INQUIRIES ABOUT THIS COUNNTY DEBT MANAGEMENT STRATEGY PAPER 2020/21 –
2022/23 SHOULD BE ADDRESSED TO: CHIEF OFFICER, FINANCE AND ECONOMIC PLANNING

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FOREWORD

The preparation of this County Medium Term Debt Management Strategy (MTDMS) is guided by the Public Finance Management Act of 2012 and the PFM County Regulations of 2015. This is the second debt strategy paper to be prepared after devolution took effect, and also under the current county administration after the 2017 general election.

Public debt management forms an integral part of macroeconomic environment in any economy. It has implications on public expenditure and also has a direct bearing on macroeconomic stability.

Regular preparation and publication of the MTDS promotes transparency in the conduct of budget financing and public financial management. The County Treasury is committed to funding annual budget deficits from sources characterized by lower costs and minimal risks to ensure that the County's debt remains within sustainable levels.

The MTDMS emphasizes the need to adhere to the laws and Regulations governing public debt management. This is a good signal to the credit/debt rating agencies and capital markets that the county government is committed to ensuring debt sustainability and therefore is likely to meet its debt obligations in a timely manner.

So far the county has not taken any loans, however the County has experienced debts arising from payment arrears. These are unpaid bills owed to suppliers of goods and services—pending bills

Considering the current level of debt/pending bills arising from county departments, the MTDMS 2021 will reinforce measures geared towards reduction of county debt and also formulates strategies that provide an overall guidance for the best management of debt in the medium term.

The County MTEF budget estimates for FY 2020/21 and the medium term projections show an enlarging financing gap, thus justifying the need for this strategy. The MDA's budget deficit has continued to widen over the years. A case at hand is that of the ministry of Health in spite of the fact that it has been taking up the budgets lions share, it still has a large deficit in allocations compared to requirements. The bulk of these funds directed towards health sector goes towards recurrent expenditure. Less than three percent goes to development expenditure. To bridge this deficit, the county government will borrow to invest in such crucial areas with the aim of not only improving them but also transforming them.

In conclusion, development of prudent debt management requires concerted efforts to constantly explore ways to mitigate the costs and risks in County Government's debt portfolio. It may also be necessary to review the legislations and to strengthen institutional arrangements for debt management including implementation of other new policies as may be required.

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The CEC Member in charge of Finance and Economic planning provided invaluable leadership and policy direction in the preparation of this Debt Management strategy Paper.

The process of preparing Debt Management Strategy was undertaken by a dedicated team led by the Directors; Economic Planning and Budget. Special thanks to the team of county budget and economic planning staff who are composed of Finance officers and Economists.

The input of all the technical staff from the County treasury in the process of formulating and consolidating issues in the document is highly appreciated.

To these and others not mentioned here, God Bless you abundantly.

JONATHAN NAMULALA
CHIEF OFFICER, FINANCE AND ECONOMIC PLANNING

LEGAL BASIS FOR THE PUBLICATION OF THE DEBT MANAGEMENT STRATEGY

The PFM Act 2012 under Section 104 cites the mandate of the County Treasury as that of monitoring, evaluating and overseeing the management of public finances and economic affairs of the County Government, including managing the county government's public debt and other obligations and developing a framework of debt control for the county. To this effect the County Treasury is required under Section 123 to prepare and submit to the County Assembly a statement setting out the debt management strategy of the county government over the medium term with regard to its actual liability and potential liability in respect of loans and its plans for dealing with those liabilities, on or before the 28th February in each year.

As soon as practicable after the statement has been submitted to the county assembly under this section, the County Executive Committee Member for Finance shall publish and publicize the statement and submit a copy to the Commission on Revenue Allocation and the Intergovernmental Budget and Economic Council.

The information in the statement shall include –

- (a) The total stock of debt as at the date of the statement;
- (b) The sources of loans made to the county government;
- (c) The principal risks associated with those loans;
- d) The assumptions underlying the debt management strategy; and
- (e) An analysis of the sustainability of the amount of debt, both actual and potential.

Other sections that guides on the management of the county debt in the Act includes:

- Section 140 on authority for borrowing by county governments, requires that borrowing by county governments is undertaken in accordance with the debt management strategy of the county government over the medium term;

Section 141 on obligations and restrictions to county borrowing, requires that a county government shall ensure that it's financing needs and payment obligations are met at the lowest possible cost in the market that is consistent with a prudent degree of risk, while ensuring that the overall level of public debt is sustainable;

Section 142 which deals with borrowing by county government entities;

Section 143 that deals with persons who are authorized to execute loan documents at county government level;

Section 144 which deals with issuance of county government securities As such maintaining a sustainable level of debt as approved by the county assembly is highlighted as one of the fiscal responsibility principles, under Section 107 of the Act.

Other documents that inform the preparation of debt management strategy are; county fiscal strategy paper (CFSP), county budget review and outlook paper (CBROP), sector reports and the annual financial statement.

The PFM (County Regulations) 2015 which gave effect to the provisions of the Public Finance Management Act, 2012 stipulates that debt service payments shall be a first charge on the County Revenue Fund. Under Section 41 on budget execution, the county governments are required to ensure that they don't default obligations to the extent possible. Part XIV of PFM County Regulations is detailed on provisions of the county public debt management as follows;

- Section 176 highlights the guiding principles for county government borrowing
- Section 177 highlights the borrowing powers of the county government
- Section 178 details the purposes for borrowing

Section 179 gives the county total public debt threshold, pursuant to section 50(5) of the Act. According to part one (1) of section 179, a county public debt shall not exceed twenty percent (20%) of the county government's most recent audited revenues, as approved by county assembly. Part two(2) under this section, further states that the annual debt service cost of a county government shall not exceed fifteen (15%) percent of the most recent audited revenue of that county government, as approved by county assembly.

- Section 180 guides on setting of debt limit in the County Medium Term Debt Management Strategy, pursuant to Section 141 of the Act
- Section 187 highlights the requirement and process for preparation of the county medium term debt management strategy

LIST OF ABBREVIATIONS AND ACRONYMS

ADB	: African Development Bank	GDP	: Growth Domestic Product
BCG	: Bungoma County Government	GFS	: Government Finance Statistics
BRICS	: Brazil, Russia, India, China and South Africa	ICT	: Information Communication Technology
CBAs	: Collective Bargaining Agreements	IDA	: International Development Association
CBR	: Central Bank Rate	IFAD	: International Fund for Agricultural Development
CGoB	: County Government of Bungoma	MTBF	: Medium Term Budget Framework
CIDP	: County Integrated Development Plan	MTDMS	: Medium Term Debt Management Strategy
CMTD	: County Medium Term Debt Management Strategy	MTEF	: Medium Term Expenditure Framework
CSDF	: County Strategic Development Framework	OPEC	: Organization of the Petroleum Exporting Countries
CSDF	: County Strategic Development Framework	PFMA	: Public Finance Management Act
DMS	: Debt Management Strategy	PPP	: Public Private Partnerships
ECDE	: Early Childhood Education	SACCOS	: Savings and Credit Cooperative Societies
EIB	: European Investment Bank	SDGs	: Sustainable Development Goals
EU	: European Union	WB	: World Bank
FDI	: Foreign Direct Investments		
FY	: Financial Year		

EXECUTIVE SUMMARY

This County Medium Term Debt Management Strategy (CMTDS) is the second formal strategy for management of debt. Prior to 2018, counties were required to maintain balanced budgets hence little or no debt was accumulated since 2013. With this strategy in place, and with National Government guarantees, Bungoma County is expected to initiate borrowing externally and domestically to finance budget deficits and bridge the gap between resource requirements and allocation.

The County MTEF budget estimates for FY 2020/21 and the medium term projections show an enlarging financing gap, thus justifying the need for this strategy. With the county administration focusing on initiating significant flagship projects, this provides a considerable evaluation and revision of the debt sustainability thresholds and gives the county scope for prudent borrowing going forward.

Budget Summary for FY 2020/21 – 2022/23

Classification	Proposed MTEF Ceiling	Total County Requirements	% Available
Recurrent:	23,552,173,593.03	46,379,145,246.89	50.7
Development:	11,688,761,025.00	37,964,174,229.09	30.7
Total	35,240,934,618.03	84,343,319,475.98	41.2

NB: This means we can finance 50.7% of total recurrent requirements and only 30.7% of total development requirements. The county will therefore rationalize expenditure with a view of reducing recurrent expenditure and increasing development expenditure on key infrastructural programs.

PFM County Government Regulations Sec. 179(1) states that public debts should not exceed 20% of the most recent and audited revenues

Pending Bills As at 30 th June 2019				
Vote No	Vote Title	Recurrent	Development	Total
1	Agriculture, Livestock Fisheries and Cooperative development	15,448,745	62,290,313	77,739,058
2	Health and Sanitation	73,684,537	180,046,477	253,731,014
3	Education-	561,544	163,451,699.8	164,013,244

Pending Bills As at 30 th June 2019				
Vote No	Vote Title	Recurrent	Development	Total
4	Water and Natural Resources	3,336,690	55,092,145	58,428,835
5	Tourism and Environment	16,762,120	0	16,762,120
6	Lands, Urban and Physical Planning	1,599,610	27,811,902	29,411,512
7	Housing	0	0	0
8	Bungoma Municipality	400,000	0	400,000
9	Kimilili Municipality	312,500	0	312,500
10	Gender Culture Youth and Sports	10,825,970	101,555,514	112,381,484
11	Public Service Management and Administration	27,617,042	8,638,991	36,256,033
12	Office of the County Secretary	6,000,000	0	6,000,000
13	Roads, Transport and Public Works	0	576,262,338	576,262,338
14	Trade, Energy and Industrialization	1,360,460	19,465,434	20,825,894
15	Finance and Economic Planning	10,564,245	60,634,390	71,198,635
16	Office of the Governor and Deputy Governor	4,077,465	0	4,077,465
17	County Public Service Board	15,016,147	0	15,016,147
18	County Assembly	0	0	0
	TOTAL	187,567,075	1,255,249,203.8	1,442,816,279

During this CMTDS period, practical options must be identified for the county to implement in order to keep its future financing requirements at prudent levels and a minimum degree of cost and risk as a high priority. However, as the preferred option, the county will continue to exhaust all possible financing requirements from the grant pool fund; as available from our development partners. In terms of feasibility, there are numerous potential sources of debt financing so long as the provisions of the PFMA and its regulation are observed

The strategic advice for the County Executive Committee Member for Finance on advancement of this CMTDS, for consideration of any borrowings required to finance possible budget deficits (GFS definition) and to improve the performance of the debt portfolio will be provided by the Public Debt Management Unit to be established by the County Treasury.

Four strategies are analyzed to compute the most optimal strategy for the county.

Strategy 1: External financing (semi and concessional) and some domestic bond financing. The strategy combines both external and domestic sources of loanable funds.

Strategy 2: Negotiated domestic loans, overdrafts and utilization of securities market

Strategy 3: Concessional financing. The strategy focuses on external long term, low interest loans.

Strategy 4: Bilateral financing: Strategy 4 looks at an alternative approach to making use of the external market, by borrowing from “new” bilateral creditors carrying quasi- or semi concessional terms (almost 70% of international flows), in addition to multilaterals (at half of baseline proportions), and a small 8% share of domestic debt.

In anticipation of results, Strategy 3 should exhibit a lower cost profile given advantageous interest rate terms, but foreign exchange risk may be heightened. Strategy 4 may show a low-cost/higher risk profile as well. This strategy best addresses the priority issue of refinancing risk.

Of the four strategies, **strategy 2 is the preferred option for the County Government of Bungoma to implement in the medium term.** Although it provides a higher interest cost than the other strategies, it is minimal compared to the difference in risk level due to non - exposure of domestic borrowing to foreign exchange fluctuations. With gradual development of the domestic market, it would also provide a more balanced composition of public debt with less external debt and more domestic debt.

Outline of the 2020 Debt Management Strategy Paper

This Debt Management Strategy paper consists of six chapters.

- ✦ Chapter one gives the general introduction of debt management and the general outline of the strategy.
- ✦ Chapter two gives the objectives, goals and principles of Debt Management in the county and outlines the basis on which the 2019 Debt Management Strategy is prepared.

- ✦ Chapter three discusses the macroeconomic environment, risks and potential sources.
- ✦ Chapter four provides emphasis on specific strategies the County Government intends to employ in dealing with debts in future.
- ✦ Chapter five details the Debt reduction policies and strategies designed to assist the County in its effort to reduce debts in a fast and prudent manner
- ✦ The last chapter gives the summary of the Bungoma County Debt Management strategy Paper FY 2020/2021.

CHAPTER ONE: OVERVIEW OF DEBT MANAGEMENT

1. The County Medium Term Debt Management Strategy (CMTDS) is a high priority of the County Government of Bungoma, given the increasing gap between development resource requirements and the available allocation.
2. The county has recognized the need to have a formal and explicit CMTDS in place to ensure prudent debt management as part of a stronger Medium Term Budget Framework (MTBF) to ensure county finances are placed on a sustainable footing.
3. The MTDS provides directions and benchmarks for managing the county's debt portfolio. This will lead to the 'preferred debt composition', i.e. the preferred cost-risk trade-off, taking into account constraints posed by the economic and market environment.
4. Government debt or borrowing includes the contracting or guaranteeing of domestic and external (foreign) debt through loans, financial leasing, on-lending and any other type of borrowing, including concessional and non-concessional borrowing, whatever the source.
5. The Debt Management Strategy is a framework that will guide County Government to ensure that debt levels stay affordable and sustainable, that any borrowing is for a good purpose and that the costs and risks of borrowing are minimized.
6. Most economies in the world whether developed or developing resort to borrowing in order to address any financing needs. This is a useful source of financing, however; it is worth noting that reliance on debt must be closely monitored and strategized.
7. Debt can be sustainable or unsustainable. By sustainable debt, it implies that the debt can be serviced without resorting to exceptional financing (such as debt relief) or a major future correction in the balance of income and expenditure while unsustainable debt simply means that debt inflows are exerting severe burdens on the economy in the future.
8. Unsustainable levels of debt lead to adjustments in expenditure levels, with view of obtaining additional resources which are then directed towards the repayment of debt and associated interest payments. These reallocations negatively impact on the implementation of priority Programmes, local investment, and poverty reduction initiatives.

9. Inability to repay debts can lead to a situation known as debt distress. A county is said to be in this situation when one or more of the following conditions hold:
- a) The sum of interest arrears is large relative to the outstanding stock of debt;
 - b) A county receives debt relief in the form of rescheduling and or debt reduction from the creditors, and
 - c) The county receives substantial budget support from the national government through the conditional grants.
10. The cost of financing increases due to failure to repay debt obligations as well as making it increasingly difficult to obtain financing from development partners. This makes it necessary therefore for the County Government to undertake a review of its debt situation based on the present stock debt as well as future commitments and obligations.

CHAPTER TWO: OBJECTIVES OF DEBT MANAGEMENT STRATEGY

11. The main objective of the Bungoma County Government Debt Management Strategy is to meet the County Government's financing requirements at the least cost with a prudent degree of risk.
12. The Debt Management Strategy will guide County Government debt management operations in the FY 2020/2021 and the medium term. The Strategy seeks to balance cost and risk of county debt while taking into account the county government financing needs. In addition, the strategy incorporates initiatives to seek new funding sources, support the County Government development priorities and achieve debt sustainability.
13. The Debt Management Strategy will provide appropriate guidelines and direction to assist in making sound debt management decisions, while demonstrating strong financial management practices for posterity.

2.1 Scope of the Medium Term Debt Management Strategy

14. This CMTDS covers the County Government of Bungoma (CGoB) anticipated debt portfolio which includes external debt, domestic debt, and contingent liabilities of on-lent debt and guaranteed debt with the public and other enterprises.
15. External debt is defined as debts denominated in currencies other than Kenyan shilling while domestic debt is defined as debt denominated in Kenyan shillings, even when the creditor is a foreign entity.
16. In line with international reporting requirements, CGoB will consider review in future for current reporting of domestic debt (as may be required) to include the outstanding liability for transfer value under the pension scheme for civil servants.
17. Although the focus of the CMTDS is on actual direct liabilities of the CGoB, contingent liabilities (whether explicit or implicit) may have an important bearing on the sustainability of debt and robustness of this strategy. Consequently, it is prudent to consider the potential risk that contingent exposures could materialize under specific scenarios and thus may need to be addressed in the future.

2.2 Goals for the Debt Management Strategy

18. The aim of the CMTDS is to support the government's strategy in implementing FY2020/21 budget and over the medium term by ensuring that the government's financial requirement and payment obligations are met at the lowest cost with prudent degree of risk in line with PFM Act, 2012. In addition, the strategy will;

- a) Underscore the County Government's commitment to developing and designing a strategy that is evidence based and feasible in ensuring that public debt levels remains sustainable and supports broad-based and inclusive growth.
- b) Serve as a strategy of financing the fiscal deficit of the County Government over the medium term

2.3 Debt Management Strategy Financing Principles

19. The debt management strategy will address the County government's financing requirements at the lowest cost and a prudent degree of risk by adhering to the following principles:

- i. Financing must be pegged on debt sustainability over long term.
- ii. Prudence must be observed when contracting debt while taking into account the cost and risk implications.
- iii. Debt must be contracted to support expenditure in the identified County priority areas that are transformative
- iv. Debt must be guaranteed
- v. The debt must be for capital projects

CHAPTER THREE: MACROECONOMIC ENVIRONMENT, RISKS AND POTENTIAL SOURCES

20. The Kenyan economy remains resilient and grew by an average of 5.5 percent in the first three quarters of 2019, mostly supported by strong performance in the services sector. Growth momentum is expected to pick up to 5.6 percent in 2019, 6.1 percent in 2020 and further to 7.0 percent over the medium term supported by a strong rebound in the agricultural output, steady recovery in industrial activities, robust performance in the services sector, and investments in strategic areas under the “Big Four” Plan.
21. Economic growth has remained strong and resilient even under emerging global challenges, supported by strong public and private sector investment and appropriate economic and financial policies. The broad-based economic growth has averaged 5.7 percent for the last six years (2013 to 2018) outperforming the average growth rate of 4.7 percent in the period 2008 to 2012 and 5.4 percent in the period 2003 to 2007. Growth is estimated at 5.6 percent in 2019 and projected to recover to 6.1 percent in 2020
22. The economy continues to register macroeconomic stability with low and stable interest rates and a competitive exchange rate to support exports. At 5.8 percent in December 2019, year-on-year overall inflation remained stable and within the 5 (+/-2.5) percent target largely due to lower food prices following favorable weather conditions. Inflation is expected to remain within target in 2020, largely due to lower energy prices and expected stability in food prices.

3.1 Potential Financing Sources

23. The potential sources of Loans for Bungoma County Government fall under two categories:

- a) Domestic sources of Loans
- b) External sources of loans

3.1.1 Domestic Sources of funding

24. Potential sources of domestic funding to the County Government consist of borrowing from local Financial and non-financial institutions.

3.1.2 External sources of funding

25. The main sources include Loans and grants from bilateral and multilateral organizations.

CHAPTER FOUR: ANALYSIS OF FUNDING SOURCES

26. Infrastructure and reconstruction spending is a near-term priority, while in the medium term, the county will aim to gradually reduce the debt-to-revenue ratio. The county continues to be exposed to natural disasters e.g. fall army worms, landslides and lightning, as well as the priority development needs, which requires careful management of fiscal space.
27. Borrowing will be limited to financing of the budget gap for the various initiatives undertaken by the county in efforts to diversify and stimulate the economy.
28. During this 3 year period of the CMTDS, the county does not project to undertake any external borrowing under commercial terms but only on concessional terms. On other financing options as explored in this CMTDS it includes 'existing' sources and also 'potential' sources that the county can consider to seek financing from.

Table 1 provides information on related potential Creditors and briefly includes some cost and risk indicators on the various types of financing.

Table 1: Creditors Cost and Risk Indicators

	Creditors			Cost indicators	Risk Indicators:
Multilateral					
	Concessional				
		IDA, ADB, IFAD, EI	Highly Concessional	Very low interest rates	Fixed Interest rates Long amortization profile Foreign currency, risk mitigated by the long amortization profile
	Potential	Japan	Highly Concessional	Very low interest rates	Fixed Interest rates Long amortization profile Foreign currency, risk mitigated by the long amortization profile
Bilateral					
	Potential				
		China	Semi-concessional	low interest rates	Foreign currency indicators Fixed interest rates
		Rep. of Korea	Focusing on rural development and ICT		Depending on the source of financing
		India	Focusing on agricultural projects		Depending on the source of financing
		Indonesia	Focusing on social transformation		Depending on the source of financing
		Africa Development Bank	Focusing on infrastructure development		Foreign currency indicators Fixed interest rates
Theme Funds					
	Potential:				
		Climate Change Funds	Grants/Loans		depending on the source of financing
Domestic					
	Bonds	Domestic		Market - will reflect market development	Depends on tenors achieved, may be some re-fixing, indexation creates other risk exposures
	Loans	Commercial loans		Respond to changes in interest rates	Interest fluctuations create risk exposures

29. Under non-traditional sources of financing, such as Climate Change ‘theme funds’, the WB manages 6 climate change funds, which could provide important amounts of financing for the county.

30. For consideration in future periods, some semi or concessional financing may also be available from other sources such as Brazil, Russia, India, Indonesia, China, South Africa (BRICS), and from the European Union (EU) and the Organization of the Petroleum Exporting Countries (OPEC).

CHAPTER FIVE: STRATEGIES FOR MANAGEMENT OF DEBT IN THE MEDIUM TERM

31. The County Debt Management Strategy presents four main strategies that CGoB will explore in the next three years in debt management. These strategies include:

Strategy 1: External financing (semi and concessional) and some domestic bond financing

- a) To evaluate the cost and risk aspects of borrowing practices for Bungoma County, and to use these factors to set a benchmark for examining different approaches.
- b) In conclusion, this strategy is based on current practice of external and domestic borrowing, that it does not best address the priority issues of foreign exchange risk, liquidity and repayment risk, creditor concentration risk and refinancing risk.
- c) Under the cost and risk analysis over the 3 year period, this strategy in comparison to 2, 3 and 4, provides medium to high risk mainly due to the foreign exchange factor and low to medium cost in relation to County revenues.

Strategy 2: Negotiated domestic borrowing and utilization of securities market

- a) To examine the cost and risk aspects of taking steps to further develop the domestic debt market, Strategy 2 highlighted an overall balance of new borrowing that tapped the domestic market for 95% of financing requirements, and the external debt market for 5%. A domestic yield curve was established following the existing rate structure in Kenya for the 5-6 year debt stock, and extended to cover the issuance span from 1 to 10 year maturities.
- b) Bond issuance was posited to be concentrated by almost 60% (of domestic flows) in 5-6 year bonds—deepening the existing market, while building to an average 30% concentration in 10-year bonds—establishing a longer term maturity in the market; and by an average 7% at the 1-year maturity. A priority, one would anticipate greater costs for this strategy vis-à-vis baseline, given the higher level of domestic interest rates versus international concessional ones; but exchange rate risk would be diminished by the higher share of domestic-currency denominated debt.
- c) In conclusion, this strategy best addresses the priority issue of foreign exchange risk and liquidity and repayment risk with rollover of domestic securities on maturity.
- d) Under the cost and risk analysis over the 3 year period, this strategy in comparison to 1, 3 and 4, provides low risk mainly due to the foreign exchange factor of external borrowing

and high cost in relation to county revenues due to the interest rate factor and shorter maturity compared to external borrowing.

Strategy 3: Concessional financing

- a) Strategies 3 and 4, in contrast to Strategy 2, examine the tradeoffs in expanding external borrowing.
- b) This strategy best addresses the priority issue of refinancing risk. Under the cost and risk analysis over the 3 year period, this strategy in comparison to 1, 2 and 4, provides medium risk mainly due to the foreign exchange factor and lowest cost in relation to county revenues due to the interest rate factor available from multilateral sources offering highly concessional terms.

Strategy 4: Bilateral financing

- a) Strategy 4 looks at an alternative approach to making use of the external market, by borrowing from “new” bilateral creditors carrying quasi-or semi concessional terms (almost 70% of international flows), in addition to multilaterals (at half of baseline proportions), and a small 8% share of domestic debt. In anticipation of results, Strategy 3 should exhibit a lower cost profile given advantageous interest rate terms, but foreign exchange risk may be heightened. Strategy 4 may show a low-cost/higher risk profile as well.
- b) In conclusion, this strategy best addresses the priority issue of creditor concentration risk.
- c) Under the cost and risk analysis over the 3 year period, this strategy in comparison to 1, 2 and 3, provides highest risk mainly due to the foreign exchange factor and less concessional terms (from terms offered by multilateral sources).
- d) To determine the cost-risk profile of the baseline macroeconomic scenario-borrowing strategy combination, a set of standard market shock tests are applied to the strategy in order to assess the different vulnerabilities to exchange and interest rate fluctuations.
- e) Given the analysis of the four strategies based on the lowest cost and risk between the four strategies, Strategy 3 best addresses that requirement. However, on the priority requirement to minimize the significant level of foreign exchange risk as a result of the high proportion of external debt at 91% (compared to 9% of domestic debt), under this strategy CGoB will continue to be vulnerable to this risk in the medium term. Further,

with progressing of the county economy, access to highly concessional borrowing from multilateral sources will also become limited.

- f) To consider the strategy that best addresses the high risk of foreign exchange and comparison of difference between cost and risk of the four strategies. Strategy 2 is the preferred option for CGoB to implement in the medium term. Although it provides a higher interest cost than the other strategies that it is minimal compared to the difference in risk level due to no exposure of domestic borrowing to foreign exchange. With gradual development of the domestic market that it would also provide a more balanced composition of public debt with less external debt and more domestic debt.

CHAPTER SIX: BASELINE PROJECTIONS AND BEST PRACTICES IN DEBT MANAGEMENT

6.1 Fiscal Policy

32. **The county fiscal policy** is a primary tool to improve income distribution through both its revenue and spending policies. Fiscal policy are designed to support macroeconomic stability, correct market failures and provide public goods with particular emphasis on inclusiveness, in particular elderly welfare, special needs of vulnerable groups and the disabled, access to free and improved health care, and free basic primary education and subsidized post-secondary education.
33. To ensure prudent debt management, the county will pursue with improvements the following measures (with support of specific policies):
- a) Improving estimation of funding ceilings based on realistic assessments of revenue raising capacity, budget support and development assistance, and where appropriate prudent borrowing;
 - b) More careful assessing and managing of appropriate levels of public debt and cash reserves required to create fiscal space to respond to shocks and unforeseen events;
 - c) Improving budget allocation across sectors by better analysis, prioritization and discussions to better align funding allocations to departmental/agency corporate plans based on the County Strategic Development Framework (CSDF) and overall available funding;
 - d) Improving quality of expenditure by ensuring commitments are properly cost and funded, restricting ad hoc funding additions during the year, improved financial management and reporting, linked to reporting on progress against sectoral plan indicators.
 - e) Establishment of Debt Unit: The County should establish a Debt Management Unit which will be in charge of debt audit, managing debtors and creditors' information.
 - f) Payment of creditors: The Bungoma County Government to pay its creditors promptly to maintain good cordial relationship with them and to reduce the risk of accruing interest which becomes a burden in the long.
 - g) Monthly savings: The departments should save monthly by reducing unnecessary expenditure even those budgeted for and use the monies for debt payment and in economic development subject to approval by the county assembly.

- h) Stakeholders' Involvement: Some activities such as cleaning the environment, tree planting to be undertaken through involvement of the community. This will be a strategy to minimize debts arising through wages and allowances.

6.2 Monetary

34. Monetary policy is a preserve of the Central Bank of Kenya. However, the monetary decisions of the CBK affect the debt portfolio of counties. The roles of monetary policy include (with support of specific policies):

- a) ensuring sound financial institutions (encourage strong and viable banking);
- b) maintaining adequate foreign reserves
- c) protecting external balance (balance of payments and currency convertibility);
- d) supporting price stability (low inflation);
- e) Facilitating growth of the domestic economy.

35. The capping of interest rates to a maximum of 4.0 per cent above the Central Bank Rate (CBR) resulted in a significant decline in interest rates and a decline in credit to the private sector. However, the low interest rates presents an opportunity for the county to seek out low interest domestic loans for development expenditure.

6.3 Key Challenges for Bungoma County:

36. There are several downside risks to the baseline macroeconomic outlook. These include the risk of not securing the mandatory National Government guarantees for borrowing; remittances and tourism not increasing as robustly as expected; the county not being able to control the wage bill (due to CBAs for health workers and ECDE teachers) combined with a tax reform not resulting in the expected revenue increases. These risks are likely to dampen growth prospects, put downward pressure on the exchange rate, and lead to a rise in domestic and/or external borrowing needs.

37. Continuation of financial difficulties in the main origin countries of remittances from Kenyans abroad and main sources of tourists (USA and the EU) would negatively affect the expected national economic growth rate with negative consequences to the county (since county allocations are based on performance of the national economy). Furthermore, any

delays in implementing revenue reforms and reducing the wage bill (currently at 43%) could exert further pressure to resort to additional borrowing over the medium term.

6.4 Other Longer Term Structural Adjustments

38. The County Strategic Development Framework (CSDF), which encompasses nine priority areas, continues to guide the overall strategic reform of the county. Table – shows the projects/initiatives contained in the CSDF for the medium term.

Table 2: County Strategic Development Framework initiatives

Sector	Project/Initiative
Agriculture	Develop the Chwele Agribusiness zone
Roads and Transport	Upgrade 250 km of major county roads to bitumen standards through Public Private Partnerships
Education	Invest in provision of quality pre-school and vocational education
Sports	Renovation and modernization of Masinde Muliro Stadium
Water	Invest in safe drinking water, promote rain-water harvesting and Develop gravity fed water systems
Health	Constructing a county Referral Hospital, staffing and equipping at-least one dispensary per ward
Industry	Development of cottage and manufacturing industries
Tourism	Use partnership model to attract Tourism Investments in Bungoma County

39. In support of addressing the expected debt overhang and the requirement for fiscal consolidation and structural reform in the medium term, the CSDF covers the following related areas beyond the CMTDS.

40. **Structural Policy:** Structural reforms to facilitate the functioning of credit markets especially Savings and Credit Cooperative Societies (SACCOS) need to be implemented and with renewed vigor. The county intends to gradually improve revenue collection and management to support her growth agenda.

41. The county is committed to further strengthening the **Public Private sector Partnership (PPP)** to increase competition which helps improve quality and lower prices for customers. Promoting FDI should focus on business enabling structural reforms, and there is the need to strike the right balance between promoting FDI projects and protecting revenue base.
42. **Improving county operations to a more efficient, effective and affordable** public service needed to deliver on policies and required results while ensuring fiscal stability is a major requirement for the medium term.
43. Major reforms are under way and these relate to economic and social policy analysis, integrated development planning and budgeting, staff performance and management, improved governance and transparency as well as other technical areas.
44. The development of county domestic debt market, presents an alternative financing option for the county. This involves development of legal and institutional arrangements to obtain financial and non-financial resources to support the county development programs from individual and corporates operating within the county.
45. The county recognizes that the medium-term prospects depend on the continued implementation of its wider program of structural reforms as well as retaining a focus on the CMTDS within the wider strengthening of the MTBF to ensure that county finances are on a sustainable path. This will also provide policy space to allow better response to future shocks.

CHAPTER SEVEN: RISK SCENARIO TESTING

7.1 Inherent Risks in the Debt Portfolio

46. There are several inherent risks in any debt portfolio. The CGoB will employ various measures to mitigate these risks and to minimize the impact of various exogenous shocks on the debt portfolio. The CGoB will identify and mitigate risks to the implementation of the debt management strategy. Prudent debt management practices will be pursued over the medium-term with a view of satisfying the mandate as outlined in the CMTDS.

7.2 Risk Scenario Testing

47. Stress testing involves deciding on realistic problems (downside risks) that the county might face, and looking at how they are likely to affect the county's future economy. CGoB recognizes that stress testing is an important part of a debt sustainability analysis, where the effect of downside risks on the ability of a county to continue to make debt repayments is examined.

7.3 Analysis of Cost and Risk Indicators

48. Looking forward over the next 3 years, cautious monitoring of the county treasury's debt sustainability level is required and especially on any ease for future external borrowing. This is to ensure improvement in our current level of economic activity and prudent public debt management, in order to mitigate the vulnerability to shocks.

7.3.1 Exchange Rate Risk

49. Foreign exchange rate risk relates to vulnerability of the debt portfolio and its impact on the CGoB's debt servicing cost due to a depreciation of the Kenya Shillings (Kshs) against the currencies in which the external debt is denominated.

50. Foreign exchange movements will change both the amount of debt servicing and the value of debt outstanding, and therefore the related debt ratios. The annual external debt servicing obligations will be initiated in FY 2020/21.

7.3.2 Refinancing Risk

51. Rollover risk is the risk that a maturing debt cannot be replaced or refined, or that the replacement debt will be more expensive.

7.3.3 Interest Rate Risk

52. Interest rate risk is the risk associated with interest rate changes in the debt portfolio.

53. The weighted average interest rate of both external and domestic debt will be estimated at the end of every FY for analysis to inform decision making organs.

7.3.4 Liquidity and Repayment Risk

54. Servicing debt is a primary concern for debt management and to ensure that the total expenditure including debt service costs does not exceed revenue collected. This risk can be expressed as the cost of debt repayments compared with funds available.

55. This is a real risk for CGoB especially from FY 2020/21 with the initiation of external debt servicing costs. In comparison of these costs to both revenue and expenditure it may create inability to meet all the repayments as they fall due.

56. According to the County MTEF report for the period 2020/21 – 2022/23, the county total resource requirements are estimated at Kshs 26,828,955,321 for FY 2020/21, Kshs 28,007,456,209 and Kshs 29,506,907,946 For FY 2021/22 and 2022/23 respectively as indicated in table-

FY	Requirements	Allocation	Financing Gap
2020/21	26,828,955,321	10,740,367,211	16,088,588,110
2021/22	28,007,456,209	11,960,458,617	16,046,997,592
2022/23	29,506,907,946	12,540,108,790	16,966,799,156

57. The County Governments projects to borrow Kshs. 1,599,818,364 in total which would be split into recurrent and development components as follows:

Nature of expenditure	Amount(Kshs.)	Source	Justification
Recurrent	450,000,000	Overdraft(CBK)	Cash flow management(One month projected cash flow needs)
Development	1,149,818,364	Medium term/Long-term concessional loan borrowing	Financing gap priority for long-term projects
Total	1,599,818,364		

This means that the County Government would have two types of borrowings; short-term (overdraft) to finance short-term liquidity needs and long term to finance priority projects.

58. Assuming the county borrowed a loan of Kshs 1,149,818,364 in FY 2020/21 at a negotiated interest rate of 7% pa, table 3 shows the costs for debt servicing over the next 15 years, with the analysis showing that we need to set aside Kshs 126,244,070 pa for 15 years. (inclusive of interest)

Table 3: Annual cost of debt servicing over 15 year period

Year	Loan bal	Rate	Interest	Total loan bal	Repayment	Year end bal
1.	1,149,818,364	0.07	80,487,285	1,230,305,649	126,243,876	1,104,061,774
2.	1,104,061,774	0.07	77,284,324	1,181,346,098	126,243,876	1,055,102,222
3.	1,055,102,222	0.07	73,857,156	1,128,959,378	126,243,876	1,002,715,502
4.	1,002,715,502	0.07	70,190,085	1,072,905,587	126,243,876	946,661,711
5.	946,661,711	0.07	66,266,320	1,012,928,031	126,243,876	886,684,155
6.	886,684,155	0.07	62,067,891	948,752,046	126,243,876	822,508,170
7.	822,508,170	0.07	57,575,572	880,083,742	126,243,876	753,839,867
8.	753,839,867	0.07	52,768,791	806,608,657	126,243,876	680,364,782
9.	680,364,782	0.07	47,625,535	727,990,316	126,243,876	601,746,441
10.	601,746,441	0.07	42,122,251	643,868,691	126,243,876	517,624,816
11.	517,624,816	0.07	36,233,737	553,858,553	126,243,876	427,614,677

Year	Loan bal	Rate	Interest	Total loan bal	Repayment	Year end bal
12.	427,614,677	0.07	29,933,027	457,547,704	126,243,876	331,303,829
13.	331,303,829	0.07	23,191,268	354,495,097	126,243,876	228,251,221
14.	228,251,221	0.07	15,977,585	244,228,806	126,243,876	117,984,931
15.	117,984,931	0.07	8,258,945	126,243,876	126,243,876	0

7.3.5 Creditor Concentration Risk

59. Creditor concentration risk refers to risks associated with most of the debt portfolio being held by one or two creditors. Those who hold a large proportion of debt could have a vested interest in the course of a county's affairs and could potentially have an undue influence in policy development.

60. In order to diversify the investor base, the County Treasury will work closely with the National Treasury as may be required to explore the scope and options of instruments to offer the domestic market.

7.3.6 Credit Risk of on-lent and guaranteed loans

61. When the level of outstanding on-lent loans from CGoB is high, there is an implicit exposure to default and non-payment of obligations by the borrowing entities even when the loans are guaranteed. Introducing more analysis and oversight of these transactions will reduce the overall risks embedded in the CGoB's debt portfolio.

7.4 Other Risks in Managing the Portfolio

7.4.1 Operational Risk:

62. The operational risks arise from a small staff size and limited capacity. The difficulty in developing and retaining skilled staff in the Debt Management office is a risk for Treasury and the CGoB in general.

63. In order to address this risk, Debt Management Unit Staff should undergo capacity development through external trainings organized by the National Treasury and donors such as the IMF-WB on respective areas of debt management.

7.4.2 Strategic Risk

64. Strategic risk is the risk that decisions made about management of the debt portfolio have a high opportunity cost.
65. If the CGoB decides not to borrow, then it could miss out on grant funding (if grant funding for these projects is not available from other sources). If decisions to borrow for particular projects do not match expectations, then this money could have been better spent elsewhere on other, more beneficial projects. Money spent on servicing debt might be better spent on providing essential services.
66. Alternatively, it is better to pay down debt (which saves the CGoB future interest payments and increases borrowing opportunities in the future) rather than spending funds unwisely.
67. In view of this risk, the county treasury as part of the annual budget preparation needs better review and coordination to best determine for any financing that the CGoB may require and to analyze the related costs and risks for those options.

7.4.3 Financial Risk

68. Financial risk is the risk that the CGoB's portfolio management is so poor that it creates a source of instability for the private sector. The risk for Bungoma is that a poorly managed debt portfolio will mean that less money is available for servicing the county's basic needs which could undermine development and progress towards the CIDP, Vision 2030, SDGs and other interlinked plans.
69. A burgeoning debt portfolio or a build-up of debt arrears might negatively influence investor confidence, weakening private sector activity, leading to a withdrawal of investment in the county, a decline in growth prospects and a further increase in debt to revenue ratios. This is an extreme risk.

CHAPTER EIGHT: SUMMARY AND CONCLUSION

70. The 2020 Debt Management Strategy (DMS) is a robust framework for prudent debt management. It provides a systematic approach to decision making on the appropriate composition of debt finance taking into account both cost and risk.

71. There is need for active investor and market consultation to get up to date information on the market. This will help in prior determination of the investor appetite for the various instruments before it is due.
72. There is need for constant monitoring and review of performance and progress made on the medium term debt strategy. County debt information will be published more regularly to enhance transparency on debt management in accordance with best international practices.
73. The recommended strategy is one that seeks the issuance of medium to long term domestic debt, and contracting of external concessional debt.
74. As required under the Public Finance Management Act 2012, the Strategy is in line with the county policy objectives. Going forward, the County Government will implement measures aimed at enhancing transparency and accountability in public debt management.

ANNEX I: The Public Finance Management (County Governments) Regulations, 2015

PART XIV—PUBLIC DEBT MANAGEMENT

Guiding principles for county government borrowing.

176. County government borrowing shall be guided by the following principles—

- (a) Need to ensure stability of domestic financial markets;
- (b) Promotion of inter-generational equity in the sharing of burdens and benefits of public borrowing;
- (c) Determination of thresholds of borrowing rights for both levels of government;
- (d) Use of objective criteria for evaluating county government eligibility for national government debt guarantee; and
- (e) Prudence and equity in setting limits for debt stock levels for each county government.

Borrowing powers for county governments.

177. (1) The County Executive Committee Member derives powers to raise loans for the County Government from section 140 of the Act.

(2) A county government may from time to time borrow within and outside Kenya such sums of money in such amount and on such terms and conditions as to interest, repayment, disbursement or otherwise as the County Executive Committee Member may think fit, in any of the following manners—

- (a) By issuing County Treasury bonds;
- (b) By bank overdraft facility from the Central Bank of Kenya; and
- (c) By any other loan or credit evidenced by instruments in writing.

(3) Any borrowing by a county government under paragraph (2)

(a) And (c) of this regulation shall require a national government guarantee pursuant to section 58 of the Act.

(4) Any borrowing under paragraph (2) (b) of this regulation, shall be in accordance with section 142 of the Act and shall be deemed guaranteed by the Cabinet Secretary and that guarantee shall be secured by the county equitable share of the revenue raised nationally.

Borrowing purposes.

178. The county governments may borrow in pursuant to the requirements of sections 140 of the Act for the purpose of—

- (a) Financing county government budget deficits; or
- (b) Cash management; or
- (c) Refinancing outstanding debt or repaying a loan prior to its date of repayment; or
- (d) Mitigation against adverse effects caused by an urgent and unforeseen event in cases where the Emergency Fund has been depleted; or
- (e) Meeting any other development policy objectives that the County Executive Committee Member shall deem necessary, consistent with the law, and as County Assembly may approve.

County total public debt threshold.

179. (1) Pursuant to section 50(5) of the Act, a county public debt shall not exceed twenty percent (20%) of the county government's most recent audited revenues, as approved by county assembly.

(2) The annual debt service cost of a county government shall not exceed fifteen (15%) percent of the most recent audited revenue of that county government, as approved by county assembly.

(3) Parliament may review the limit under paragraph (1) of this regulation five years after the commencement date of these Regulations.

Setting Debt Limit in the County Medium Term Debt Management Strategy Section 141

180. (1) Pursuant to Section 141 (2) of the Act, 2012, the debt limit at any given time shall not exceed the nominal value of the total county public debt that is determined county assembly within the limits set under Section 50 (5) of the Act and in accordance with fiscal responsibility principles under regulation 25 of the these Regulations.

(2) The debt limit under paragraph (1) of this regulation shall be specified annually in the county fiscal strategy paper and the medium term debt management strategy paper.

(3) The annual new government debt shall be consistent with the debt limits set out under paragraph (1) of this regulation.

(4) For the purposes of monitoring compliance with the limits under paragraph (1), the amount of county government debts which are not denominated in Kenya shillings shall be recalculated at the prevailing exchange rate of the Central Bank of Kenya.

Eligibility and evaluation criteria for guarantee requests by county government.

181. (1) Pursuant to the provisions of section 58 of the Act, the capital project expenditures of county governments for which a guarantee for issuance of domestic government security is requested, shall meet the following requirements—

(a) The county government shall demonstrate that the project could not be financed on reasonable terms and conditions without a county government loan;

(b) An economic analysis is made demonstrating the projects cash flow clearly setting out a borrowing and repayment plan;

(c) It is a feasible project that has been approved by the county government entity as may be required by county legislation;

(d) The county government meets all the fiscal responsibility principles set out in the Act and these Regulations.

(e) The borrowing shall be for financing a devolved function capital project; and

(f) Any other requirements as the Cabinet Secretary may prescribe in the gazette.

(2) Pursuant to the provisions of section 58 of the Act, the capital project expenditures of county governments for which a guarantee is requested, shall meet the following requirements—

(a) The county government shall demonstrate that the project could not be financed on reasonable terms and conditions without a government loan;

(b) Provide the projected cash flow clearly setting out a projected disbursement schedule and repayment plan;

(c) The county government shall contribute a substantial portion of project funds from their own resources and in any case not less than fifteen (15) percent;

(d) A county government that defaults on a loan shall not be eligible for a loan guarantee and shall only be eligible upon successful completion a financial recovery programme agreed by the County Treasury and National Treasury;

- (e) It is a feasible project that has been approved by the county government entity as may be required by national or county legislation;
- (f) The application of the guarantee shall be submitted with a signed loan agreement but only for loans on concessional terms in the case of external loans;
- (g) any county government applying for a national government guarantee shall meet all the fiscal responsibility principles set out in the Act and these Regulations unless exempted under certain conditions by the Cabinet Secretary;
- (h) The borrowing shall be financing a devolved function capital project in line with the Fourth Schedule of the Constitution;
- (i) The lender is of good credibility and standing with the Government of Kenya;
- (j) The guarantee is in the public interest; and
- (k) Any other guidelines as Cabinet Secretary may prescribe in the gazette.

Criteria for issuance of county government securities.

182. (1) the issuance of county government securities to raise debt capital shall be by way of auction or such other method as County Executive Committee Member may determine with the concurrence of the Cabinet Secretary.

(2) Despite the provisions of paragraph (1) of this regulation, the auction of domestic county government securities shall take into account the following factors—

- (a) Pricing of the domestic county government securities;
- (b) Refinancing risk of the domestic county government securities;
- (c) The domestic market stability when taking up domestic county government securities; and
- (d) The borrowing programme which is consistent with the county medium term debt strategy and county fiscal strategy paper.

Process of issuance of Treasury Bonds on behalf of County Governments.

183. (1) Pursuant to section 144 of the Act, a county government which intends to issue a Treasury bond shall be guided by the following procedures—

- (a) before seeking the national government guarantee, the County Executive Committee Member for finance shall develop and submit the cash plan, indicating the borrowing requirements to the County Executive Committee for approval of the borrowing including its terms and conditions;
- (b) after approval by the County Executive Committee, the County Executive Committee Member shall submit the cash plan referred to above to the County Assembly for approval of the borrowing including its terms and conditions;
- (c) Upon approval by the County Assembly, the County Executive Committee Member shall submit the final cash plan and the approval of the County Assembly to the Cabinet Secretary requesting for the guarantee of the Treasury bond and their inclusion in the issuance calendar;
- (d) the Cabinet Secretary to the National Treasury, after receiving the request from the county government, shall seek the recommendations of the Intergovernmental Budget and Economic Council in fulfillment of the requirements of section 58(2)(i) of the Act;
- (e) The Cabinet Secretary to the National Treasury may, upon taking into account the recommendations of the Intergovernmental Budget and Economic Council, approve or reject the request;
- (f) The Cabinet Secretary shall reject a request for loan guarantee with reasons and communicate the same to the

Concerned County Executive Member;

(g) Upon approval of a loan guarantee request, the Cabinet Secretary to the National Treasury shall submit the request to Parliament with recommendations seeking its approval;

(h) The Cabinet Secretary to the National Treasury shall communicate the decision of Parliament on the draft loan guarantee to the respective County Executive Committee Member for finance;

(i) Upon approval by Parliament, the Cabinet Secretary shall include such authorized Treasury Bonds in the overall national issuance calendar;

(j) Once the issuance calendar is known, when the national governments advertises its bond issuance for a specific month it shall also incorporate those to be issued on behalf of county governments;

(k) On the issuance day, the county whose bond is being issued, shall be represented in the auction committee meeting by the County Executive Committee Member or his or her representative; and

(l) After the National Treasury and the county government sign an on-lending agreement, the National Treasury shall transfer the proceeds of the Treasury Bond to the Revenue Fund of that county government and such on-lending transactions shall attract a fee to be determined by the National Treasury.

(2) The cash plan prepared under paragraph (1) above shall indicate—

(a) Financing amounts from the issuance of Treasury Bond;

(b) The timing of the bond issuance;

(c) Redemption and interest payment of previously issued Treasury Bonds plus the interest payment of the intended Treasury Bond; and

(d) The county government's cash plan to be integrated into the national government borrowing program to prepare the market for issuance.

Process for applying for a national government guarantee for external borrowing.

184. (1) Pursuant to the provisions of section 58 of the Act and before a county government seeks a guarantee from the national government, the following requirements shall be met—

(a) The County Executive Committee member for finance shall submit the borrowing proposal to the County Executive Committee for approval of the borrowing including its terms and conditions;

(b) after approval by the County Executive Committee, the County Executive Committee member for finance shall submit the signed loan agreement and a sessional paper to the County Assembly for approval of the borrowing, including its broad terms and conditions;

(c) after obtaining the approval of the County Assembly, the County Executive Committee member for finance shall submit the final draft loan financing agreement and the approval of the County Assembly to the Cabinet Secretary requesting for the guarantee of the final loan financing agreement;

(d) the Cabinet Secretary, after receiving the request from the county government, shall seek the recommendations of the Intergovernmental Budget and Economic Council in fulfillment of the requirements of section 58(2)(i) of the Act;

(e) The Cabinet Secretary to the National Treasury, after receiving recommendations of IBEC, shall seek the recommendations of the Attorney-General;

(f) The Cabinet Secretary may, upon taking into account the recommendations of the Intergovernmental Budget and Economic Council and the Attorney-General, approve or reject the request;

- (g) The Cabinet Secretary shall reject a request for loan guarantee with reasons and communicate the same to the concerned County Executive Member for finance.
 - (h) Upon approval of a loan guarantee request, the Cabinet Secretary shall submit a sessional paper to Parliament with recommendations seeking its approval;
 - (i) The Cabinet Secretary shall communicate the decision of Parliament on the draft loan guarantee to the respective County Executive Committee Member for finance; and
 - (j) Upon approval by Parliament the Cabinet Secretary shall issue a loan guarantee.
- (7) After receiving the communication of the decision of Parliament on the draft loan guarantee, the County Executive Committee member shall report to the County Assembly of the decision.

Use of moneys borrowed and credits obtained.

185. All sums borrowed under the Act shall be expended only on the activities included in the approved estimates of expenditure of the county government entities.

Objectives of county public debt management.

186. The objectives of public debt management are to ensure that the county government's financing needs and payment obligations are met at the lowest possible cost over the medium to long term, with a prudent degree of risk, and to promote development of the domestic debt market while ensuring the equitable sharing of benefits and burdens of public debt between the current and future generation.

County government medium term debt management strategy.

187. (1) any borrowing by the county government shall be informed by the county government medium term debt management strategy and shall set out the framework for the management of county public debt.

(2) The medium term debt management strategy, which is reviewed annually, shall be prepared and executed by the County Treasury.

(3) Medium term debt management strategy shall be formulated annually on a three year rolling basis.

(4) The Strategy shall be approved by the County Executive Committee.

(5) The county medium term debt management strategy shall be prepared taking into account—

- (a) The borrowing needs of the county governments;
 - (b) Fiscal responsibility principles set out in section 107 of the Act and regulation 25 of these Regulations;
 - (c) Prevailing macro-economic conditions;
 - (d) Prevailing conditions of the financial markets; and
 - (e) Any other relevant factors.
- (6) The county medium term debt management strategy shall include measures for minimizing borrowing costs with a prudent degree of risks.

Annual county Government borrowing programme.

188. (1) the county medium term debt management strategy shall be implemented through the annual county government borrowing programme for each fiscal year.

(2) The annual borrowing programme shall include issuance of county government securities, external guaranteed loans and disbursements for the fiscal year and show indicative dates of such issuance and disbursements.

Formalization of agreements for loans.

189. Negotiation with foreign governments and agencies for external loans shall culminate into and shall be formalized into one of

The following recognized instruments in addition to the national government guarantee—

- (a) Loan agreements; or
- (b) Exchange of letters that constitute an agreement; or
- (c) Subscription statement in regard to domestic government securities; or
- (d) National government guarantee.

Modes of payment (disbursement) of loan funds.

190. The procedure to be followed in the disbursement of loan funds shall be defined in the respective agreement and shall generally assume one or more of the following methods—

- (a) Credit purchase; or
- (b) Direct disbursement to the County Revenue Fund; or
- (c) Reimbursement, where the county government pays for goods and services supplied and later on claim reimbursement from the financier.

Credit purchases.

191. Where development partner have opted to give loans through credit purchase or commodity loan arrangements, for the purposes of budgeting and accounting, the following procedures shall be followed—

(a) The amount of expenditure and matching direct payment as agreed and as applicable, shall be included in the development estimates under separate items;

(b) Accounting officer shall apply through the County Treasury

For utilization of the credit purchase facility in the prescribed manner as set-out in the loan instrument;

(c) After supplying goods or services, the development partner shall notify County Treasury of the amount disbursed against the loan;

(d) The County Treasury shall record the amounts disbursed as a drawing against each loan facility;

(e) The County Treasury shall forward invoices and debit advices to the accounting officer concerned to bring the expenditure involved into account;

(f) the accounting officer shall, on satisfying herself or himself of receipt of goods and services, record the transactions in the stores ledger card and the accounting officer shall notify the County Treasury on the receipt of goods and services; and

(g) Upon receipts of the notification under paragraph (f) of this regulation, the County Treasury shall notify the Cabinet Secretary of the receipt of goods and services.

Redemption, conversion, and consolidation of loans.

192. (1) The County Executive Committee Member may, on such terms and conditions as he or she may determine, and when necessary, with the concurrence of the lender and the Cabinet Secretary—

- (a) Repay any loan prior to the redemption date of that loan; or
- (b) Convert the loan into any other loan; or
- (c) Consolidate two or more loans into an existing or new loan.

County government entities to provide data on debt.

193. A County Treasury shall submit to the National Treasury a report on county public debt as prescribed in these Regulations.

County annual debt reporting.

194. (1) not later than three months after the end of each financial year, the County Executive Committee Member shall prepare and submit an annual report to the county assembly on public debt.

(2) The annual public debt report shall be in the format gazette by the Cabinet Secretary and shall include the following information—

- (a) Review of previous year's financing of budget deficit;
 - (b) Composition of domestic debt;
 - (c) Composition of external debt;
 - (d) on-lent loans and contingent liabilities;
 - (e) Debt strategy and debt sustainability;
 - (f) Outlook for the medium term; and
 - (g) Any commitment fees and penalties paid on any undisbursed amounts of a loan.
- (3) The County Treasury shall maintain an inventory of all loans made to the county government and make the record available to the county assembly within seven days of request.
- (4) The following information shall be included in the inventory under paragraph 3 of this regulation—
- (a) the principal of the loan and the terms and conditions of the loan, including interest and other charges payable and terms of repayment and location of the project financed; and
 - (b) The amount of the loan advanced at any particular time.

Roles and responsibilities of accounting officers in debt management operations and loan administration.

195. For the purposes of debt management operations and loan administration, the accounting officers of a county government entity shall be responsible for the following—

- (a) Preparing project proposals and submitting them for approval to the County Treasury;

- (b) Where authorization has been granted for the project to start, the accounting officer shall ensure public disclosure to intended beneficiaries within thirty days of the allocation and disbursement of the loan;
- (c) After disbursement of loans, the loan recipient accounting officer shall report within fifteen days after the end of each quarter to the intended beneficiaries on the expenditures and performance achieved in relation to the loan;
- (d) During the project identification and design, the intended beneficiaries shall be involved through the public participatory approach to planning through public forums to enhance leadership, ownership, social accountability and sustainability of the project;
- (e) Preparing expected disbursements profiles;
- (f) Submitting loan disbursement claims for approval by the County Treasury;
- (g) Making comments on draft loan agreement from the County Treasury;
- (h) Participating in all consultations and negotiations of all loan agreements for projects and programmes under their jurisdiction; and
- (i) Implementing, monitoring and evaluating, in close collaboration with the county government entity responsible for county planning, all projects and programmes within their jurisdiction.

Default of payment of guaranteed loan.

196. In case of default of payment of a guaranteed loan by a county government, the provisions of section 61 and 94 of the Act shall apply.

ANNEX II

Resource Requirements versus Resource Allocations 2020/21 to 2022/23

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
Agriculture, Livestock, Fisheries, Irrigation and Co-operative Development	Gross	1,030,901,713.00	3,951,301,977.00	4,148,867,075.85	4,356,310,429.64	991,769,527	1,041,358,003.35	1,093,425,903.52
	AIA	24,723,434	123,617,170.00	129,798,028.50	136,287,929.93	24,723,434	25,959,605.70	27,257,585.99
	NET	1,006,178,279	3,827,684,807.00	4,019,069,047.35	4,220,022,499.72	967,046,093	1,015,398,397.65	1,066,168,317.53
	Compensation to Employees	282,800,080.00	544,390,154.00	571,609,661.70	600,190,144.79	311,080,088.00	326,634,092.40	342,965,797.02
	Maintenance	3,515,000.00	73,815,000.00	77,505,750.00	81,381,037.50	10,545,000.00	11,072,250.00	11,625,862.50
	Operations	57,694,159.00	765,765,000.00	804,053,250.00	844,255,912.50	32,069,108.00	33,672,563.40	35,356,191.57
	Development	686,892,474.00	3,951,301,977.00	4,148,867,075.85	4,356,310,429.64	638,075,331.00	669,979,097.55	703,478,052.43
	Total	1,030,901,713.00	5,335,272,131.00	5,602,035,737.55	5,882,137,524.43	991,769,527	1,041,358,003.35	1,093,425,903.52
Education	Gross	1,173,562,669	1,341,540,802	1,413,867,842	1,473,536,234	1,225,438,916	1,286,710,861.80	1,351,046,404.89
	AIA	2,000,000	5,000,000	5,250,000	5,512,000	1,000,000	1,050,000.00	1,102,500.00
	NET	1,171,562,669	1,336,540,802	1,408,617,842	1,479,048,234	1,224,438,916	1,285,660,862	1,349,943,905
	Compensation to Employees	909,562,669	955,040,802	1,002,792,842	1,052,932,484	955,040,802	1,002,792,842	1,052,932,484
	Maintenance	1,250,000	5,000,000	5,250,000	5,512,000	3,000,000	3,150,000	3,307,500
	Operations	262,750,000	381,500,000	400,575,000	420,603,750	267,398,114	280,768,019	294,806,421
	Development	235,225,464	580,594,332	609,624,048.60	640,105,251	221,818,717	232,909,653	244,555,135
	Total	1,408,788,133	1,917,135,134	2,018,241,891	2,113,641,485	1,447,257,633	1,519,620,515	1,595,601,540
Health	Gross	3,323,533,970	6,350,000,000	7,000,875,000	7,350,918,750	3,381,265,328	3,550,328,594.40	3,727,845,024.12
	AIA	341,564,152.10	463,600,000	463,600,000	463,600,000	463,600,000	463,600,000	463,600,000
	NET	2,981,969,817.90	5,886,400,000.00	6,537,275,000.00	6,887,318,750.00	2,917,665,328	3,063,548,594.40	3,216,726,024.12
	Compensation to Employees	1,952,566,028	2,107,407,484	2,212,777,858.20	2,323,416,751	2,107,407,484	2,212,777,858.20	2,323,416,751
	Maintenance	9,200,000	10,141,230	10,648,291.50	11,180,706.08	54,974,097	57,722,802	60,608,941
	Operations	663,293,895	1,014,520,000	1,065,246,000	1,118,508,300	417,252,504	438,115,129.20	460,020,885.66
	Development	338,031,243	338,031,243	338,031,243	338,031,243	338,031,243	338,031,243	338,031,243

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
	Grants	189,601,070	2,900,000,000	3,045,000,000	3,197,250,000	162,137,999.24	170,244,899.20	178,757,144.16
	Total	3,323,533,970	6,350,800,000	7,000,875,000	7,350,918,750	3,381,265,328	3,550,328,594.40	3,727,845,024.12
Sanitation	Gross	14,070,393	132,193,690	138,803,374	145,743,543	14,773,913	15,512,608	16,288,239
	AIA	0	0	0	0	0	0	0
	NET	14,070,393	132,193,690	138,803,374	145,743,543	14,773,913	15,512,608	16,288,239
	Compensation to Employees	896,976	15,903,025	16,698,176	17,533,085	896,976	941,824.80	988,916.04
	Maintenance	0	0	0	0	0	0	0
	Operations	1,258,133	6,290,665	6,605,198	6,935,458	1,415,680.22	1,486,464.23	1,560,787.44
	Development	0	0	0	0	0	0	0
	Grants	11,570,393	110,000,000	115,500,000	121,275,000	9,894,461.15	10,389,184.21	10,908,643.42
	Total	14,070,393	132,193,690	138,803,374	145,743,543	12,207,117	12,817,472.85	13,458,346.49
	Gross	159,787,707	230,451,200	241,973,760	254,072,448	152,090,859	176,165,947	184,974,244
Roads and Public Works	AIA	3,500,000.00	3,500,000	3,675,000	3,858,750	3,500,000	3,858,750	4,051,688
	NET	156,287,707	226,951,200	238,298,760	250,213,698	148,590,859	172,307,197	180,922,557
	Compensation to Employees	79,021,087	85,100,000	89,355,000	93,822,750	82,972,141	87,120,748	91,476,786
	Maintenance	19,305,000	42,000,000	44,100,000	46,305,000	20,270,250	21,283,763	22,347,951
	Operations	61,461,620	103,351,200	108,518,760	113,944,698	45,348,468	67,761,436	71,149,508
	Development	1,110,452,445	1,865,975,067	1,959,273,820	2,057,237,511	993,279,943	1,224,273,821	1,285,487,512
	Total	1,270,240,152.00	2,557,328,667	1,752,771,662	1,840,410,245	1,145,370,802	1,752,771,662	1,840,410,246
	Gross	44,564,778	101,892,500	106,050,000	111,352,591	41,737,485	43,824,359.25	46,015,577.21
Trade, Energy and Industrialization	AIA	850,000	892,500	937,125	938,981	892,500	937,125	938,981
	NET	43,714,787	100,000,000	105,112,875	110,413,610	40,844,985	42,887,234	45,076,596
	Compensation to Employees	17,609,212	31,839,902	33,431,897	35,103,492	18,513,935	19,439,632	20,411,613
	Maintenance	6,578,250	13,661,500	14,344,575	15,061,803.80	6,907,163	7,252,521	7,615,147
	Operations	20,377,316	54,606,098	57,336,402.90	60,203,223.05	16,316,387	17,132,206.35	17,988,816.67
	Development	115,964,006	713,550,000	749,227,500	786,688,875	128,973,208	256,671,868.40	199,505,461.82
	Total	115,964,006	713,550,000	749,227,500	786,688,875	128,973,208	256,671,868.40	199,505,461.82

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
	Total	160,528,784	815,442,500	855,277,500	898,041,466	170,710,693	300,496,228	245,521,039
Lands, Urban and Physical Planning	Gross	40,585,873	215,398,007	226,167,907	237,476,302	41,737,485	43,824,359	46,015,577
	AIA	5,997,236	6,297,097	6,611,952	6,942,550	6,122,619	6,428,750	6,750,187
	NET	34,588,637	209,100,910	219,555,955	230,533,752	35,614,866	37,395,609	39,265,390
	Compensation to Employees	29,735,179	64,094,247	67,298,959	70,663,907	30,221,937	31,733,034	33,319,686
	Maintenance	1,020,000	4,000,000	4,200,000	4,410,000	1,393,771	1,463,459	1,536,632
	Operations	9,830,694	147,303,760	154,668,948	162,402,395	10,121,777	10,627,866	11,159,259
	Development	116,877,797	646,194,021	678,503,721	712,428,906	98,939,954	103,886,952	109,081,299
	Total	157,463,670	1,292,388,042	1,357,007,442	1,424,857,812	140,677,439	147,711,311	155,096,876
Housing	Gross	19,855,883	55,755,000	58,542,750	61,469,888	20,848,677	21,891,111	22,985,667
	AIA	0				0		
	NET	19,855,883				20,848,677	21,891,111	22,985,667
	Compensation to Employees	12,252,765	17,950,000	18,847,500	19,789,875	12,865,403	13,508,673	14,185,107
	Maintenance	1,000,000	8,500,000	8,925,000	9,371,250	1,000,000	1,050,000	1,102,500
	Operations	6,603,118	29,305,000	30,770,000	32,305,763	6,983,274	7,332,438	7,699,060
	Development	10,000,000	531,200,000	557,760,000	585,648,000	10,500,000	11,025,000	11,576,250
	Total	29,855,883	586,955,000	616,302,500	647,114,888	31,348,677	32,916,111	34,561,917
Bungoma Municipality	Gross	7,400,000	107,090,000	117,799,000	129,578,900	8,039,574	8,843,531	9,727,885
	AIA	0	-	-	-	-	-	-
	NET	7,400,000	107,090,000	117,799,000	129,578,900	8,039,574	8,843,531	9,727,885
	Compensation to Employees	-	-	-	-	-	-	-
	Maintenance	-	-	-	-	-	-	-
	Operations	-	-	-	-	-	-	-
	Development	109,000,000	287,650,000	316,415,000	348,056,500	116,679,284	128,347,212	141,181,934
	Total	116,400,000	394,740,000	434,214,000	477,635,400	124,718,858	137,190,744	150,909,818
	Gross	7,400,000	75,913,800	79,709,490	83,694,965	8,039,574	8,441,553	8,863,630

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
Kimilili Municipality	AIA	0		0	0		0	0
	NET	7,400,000		0	0		0	0
	Compensation to Employees	0		0	0		0	0
	Maintenance	0		0	0		0	0
	Operations	0		0	0		0	0
	Development	200,000,000	1,197,900,000	1,257,795,000	1,320,684,750	191,089,400	200,643,870	210,676,064
	Total	207,400,000	1,273,813,800	1,337,504,490	1,404,379,715	199,128,974	209,085,423	219,539,694
Tourism and Environment	Gross	213,716,261	257,448,274	275,786,552	292,003,129	214,899,346	225,644,313	236,926,529
	AIA	1,155,000	1,212,750	1,050,000	1,102,500	1,050,000	1,102,500	1,157,625
	NET	190,561,261	256,235,524	274,736,552	290,900,629	213,849,346	224,541,813	235,768,904
	Compensation to Employees	28,716,261	35,152,074	37,842,167	39,734,275	30,152,074	31,659,678	33,242,662
	Maintenance	650,000	682,500	5,250,000	5,512,500	3,352,886	3,520,530	3,696,556
	Operations	162,394,000	170,513,700	179,039,385	187,991,354	162,770,840	170,909,382	179,454,851
	Development	22,000,000	51,100,000	53,655,000	58,765,000	18,275,800	19,189,590	20,149,069
	Total	213,716,261	257,448,274	275,786,552	292,003,129	214,899,346	225,644,313	236,926,529
Water and Natural Resources	Gross	375,860,087	500,023,091	899,623,659	944,604,842	366,086,996	416,932,475	437,779,098
	AIA	0	0	0	0	0	0	0
	NET	375,860,087	500,023,091	899,623,659	944,604,842	39,456,800	41,429,640	43,501,122
	Compensation to Employees	29,515,764	50,991,552	57,751,509	70,139,085	30,991,552	32,541,130	34,168,186
	Maintenance	600,000	5,000,000	5,250,000	5,512,500	0	0	0
	Operations	9,400,000	10,870,000	54,687,751	67,922,138	0	0	0
	Development	336,344,323	433,161,539	781,934,399	801,031,119	326,630,195	342,961,705	360,109,790
	Total	375,860,087	500,023,091	899,623,659	944,604,842	366,086,996	416,932,475	437,779,098
Gender, Culture,	Gross	110,175,415	180,115,000	198,126,500	217,939,150	121,192,956	133,312,251	146,643,476
	AIA	0	0	0	0	0	0	0
	NET	110,175,415	180,115,000			121,175,415	133,312,251	146,643,476

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
Youths and Sports	Compensation to Employees	44,675,226	49,142,748	54,057,022	59,462,75	49,142,748	54,057,022	59,462,725
	Maintenance	2,000,000	2,200,000	2,420,000	2,662,00	2,200,000	2,420,00	2,662,00
	Operations	63,500,189	69,850,207	76,835,228	84,518,751	69,850,207	69,850,228	84,518,751
	Development	136,016,248	149,617,872	164,579,660	181,037,626	149,617,872.80	149,617,872	181,031,626
	Total	246,191,663	270,810,829	297,891,912	327,681,103	270,810,829.30	267,891,912	327,681,103
Finance and Economic Planning	Gross	1,138,299,464	1,679,219,270	1,763,180,234	1,851,339,245	1,094,822,941	1,149,564,088	1,216,042,292
	AIA	0	0	0	0	0	-	-
	NET	1,138,299,464	1,679,219,270	1,763,180,234	1,851,339,245	1,094,822,941	1,149,564,088	1,216,042,292
	Compensation to Employees	575,446,924	604,219,270	634,430,234	666,151,745	604,219,270	634,430,234	666,151,745
	Maintenance	40,869,459	45,000,000	47,250,000	49,612,500	45,000,000	47,250,000	49,612,500
	Operations	521,983,081	950,000,000	997,500,000	1,047,375,000	371,491,921	390,066,517	418,569,843
	Development	0	80,000,000	84,000,000	88,200,000	74,111,750	77,817,337	81,708,204
	Total	1,138,299,464	1,679,219,270	1,763,180,234	1,851,339,245	1,094,822,941	1,149,564,088	1,216,042,292
Public Service Management and Administration	Gross	331,297,417	746,528,115	783,854,521	823,047,247	322,399,657	338,519,640	355,445,622
	AIA	-	-	-	-	-	-	-
	NET	331,297,417	746,528,115	783,854,521	823,047,247	322,399,657	338,519,640	355,445,622
	Compensation to Employees	247,762,014	349,358,115	366,826,021	385,167,322	260,150,115	273,157,621	286,815,502
	Maintenance	1,252,000	2,500,000	2,625,000	2,756,250	1,000,000	1,050,000	1,102,500
	Operations	73,283,403	209,670,000	220,153,500	231,161,175	53,630,819	56,312,360	59,127,978
	Development	9,000,000	185,000,000	194,250,000	203,962,500	7,618,723	7,999,659	8,399,642
	Total	331,297,417	746,528,115	783,854,521	823,047,247	322,399,657	338,519,640	355,445,622
Office of the County Secretary	Gross	366,208,033	809,700,000	850,185,000	892,694,250	367,380,444	375,122,577	383,251,816
	AIA	-	-	-	-	-	-	-
	NET	366,208,033	809,700,000	850,185,000	892,694,250	367,380,444	375,122,577	383,251,816
	Compensation to Employees	-	-	-	-	-	-	-

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
	Maintenance	500,890	700,000	735,000	771,750	510,000	535,500	562,275
	Operations	123,499,110	252,000,000	264,600,000	277,830,000	129,216,057	135,676,860	142,460,703
	Development	242,208,033	557,000,000	584,850,000	614,092,500	237,654,387	238,910,217	240,228,838
	Total	366,208,033	809,700,000	850,185,000	892,694,250	367,380,444	375,122,577	383,251,816
Governor's Office	Gross	405,081,527	548,261,866	575,674,959	604,458,707	396,110,903	415,916,448	436,712,271
	AIA	-	-	-	-	-	-	-
	NET	405,081,527	548,261,866	575,674,959	604,458,707	396,110,903	415,916,448	436,712,271
	Compensation to Employees	261,453,700	274,526,385	288,252,704	302,665,339	291,261,866	305,824,959	321,116,207
	Maintenance	2,859,183	4,000,000	4,200,000	4,410,000	3,000,000	3,150,000	3,307,500
	Operations	140,768,644	269,735,481	283,222,255	297,383,368	101,849,037	106,941,489	112,288,563
	Development	0	0	0	0	0	0	0
	Total	405,081,527	548,261,866	575,674,959	604,458,707	396,110,903	415,916,448	436,712,271
Deputy Governor's Office	Gross	29,528,000	55,500,000	58,275,000	61,188,750	24,996,184	26,245,993	27,558,293
	AIA	-	-	-	-	-	-	-
	NET	29,528,000	55,500,000	58,275,000	61,188,750	24,996,184	26,245,993	27,558,293
	Compensation to Employees	-	-	-	-	-	-	-
	Maintenance	1,941,000	3,500,000	3,675,000	3,858,750	2,000,000	2,100,000	2,205,000
	Operations	27,587,000	52,000,000	54,600,000	57,330,000	22,996,184	24,145,993	25,353,293
	Development	0	0	0	0	0	0	0
	Total	29,528,000	55,500,000	58,275,000	61,188,750	24,996,184	26,245,993	27,558,293
County Public Service Board	Gross	36,576,060	74,971,560	78,720,138	82,656,145	38,404,863	40,325,106	42,341,362
	AIA							
	NET	36,576,060	74,971,560	78,720,138	82,656,145	38,404,863	40,325,106	42,341,362
	Compensation to Employees	15,433,320	15,433,320	16,204,986	17,015,235	16,204,986	17,015,235	17,865,997
	Maintenance	0	1,000,000	1,050,000	1,102,500	1,000,000	1,050,000	1,102,500
	Operations	21,142,740	58,538,240	61,465,152	64,538,410	21,199,877	22,259,870	23,372,864

Department	Economic Classification	2019/20 Estimates	Requirement			Allocation		
			2020/21	2021/22	2022/23	2020/21	2021/22	2022/23
	Development	0	38,395,500	0	0	0	0	0
	Total	36,576,060	113,367,060	78,720,138	82,656,145	38,404,863	40,325,106	42,341,362
County Assembly	Gross	867,661,683	954,427,852	1,049,870,637	1,154,857,700	0	0	0
	AIA	0	0	0	0	0	0	0
	NET	867,661,683	954,427,852	1,049,870,637	1,154,857,700	0	0	0
	Compensation to Employees	393,131,886	432,445,075	475,689,582	523,258,540	0	0	0
	Maintenance	5,500,000	6,050,000	6,655,000	7,320,500	0	0	0
	Operations	469,029,797	515,932,777	567,526,055	624,278,660	0	0	0
	Development	216,000,000	237,600,000	261,360,000	287,496,000	0	0	0
	Total	1,083,661,683	1,192,027,852	1,311,230,637	1,442,353,700	0	0	0
	GRAND TOTAL	11,945,602,893.00	26,828,955,321.00	28,007,456,208.55	29,506,907,946.43	10,740,367,211.30	11,960,458,616.60	12,540,108,790.13