

# CITIES AND TOWNS BULLETIN

## AND UNIFORM COMPLIANCE GUIDELINES ISSUED BY STATE BOARD OF ACCOUNTS

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### STATE BOARD OF ACCOUNTS CONTACT INFORMATION

**SBOA Homepage:** [www.in.gov/sboa](http://www.in.gov/sboa)

*(for information specific to a city or town, select Political Subdivisions and then select city or town as applicable)*

**Directors of Audit Services for Cities and Towns:** Mike Crowley and Mitch Wilson

Email Address: [cities.towns@sboa.in.gov](mailto:cities.towns@sboa.in.gov)

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SBOA Communications: [communications@sboa.in.gov](mailto:communications@sboa.in.gov)

### **SBOA COMMUNICATIONS**

The State Board of Accounts uses a subscriber-based service to periodically send out mass emails to all cities and towns. This service allows anyone to subscribe and receive the most up-to-date guidance from our agency.

If you have not done so already, please sign up to receive our email communications on our home page ([www.in.gov/sboa](http://www.in.gov/sboa)) or by using this link <https://www.in.gov/sboa/7130.htm>.

When you receive mass emailed communications, the “from” addresses will appear as “cities.towns@subscriptions.in.gov” or “indiana@subscriptions.in.gov”. Please make sure your email software will accept communications from these addresses and won’t send them to “junk” or “spam” folders.

These communications will be “no-reply” emails, however, information will be included on where you can direct questions. As always, you can still contact Mike Crowley or Mitch Wilson at [cities.towns@sboa.in.gov](mailto:cities.towns@sboa.in.gov).

### **AMERICAN RESCUE PLAN ACT REPORTING REQUIREMENTS**

This information is from the Compliance and Reporting Guidance for State and Local Fiscal Recovery Funds: <https://home.treasury.gov/system/files/136/SLFRF-Compliance-and-Reporting-Guidance.pdf>

Metropolitan cities are required to file the Project and Expenditure Report with the U.S. Treasury 30 days after the end of each quarter thereafter.

Nonentitlement Units are required to file the Project and Expenditure Report with the U.S. Treasury annually.

User guides describing how and where to submit required reports will be posted at [www.treasury.gov/SLFRPReporting](http://www.treasury.gov/SLFRPReporting) and updated on a regular basis.

### **ACCOUNTING FOR STATE REVOLVING FUND LOANS**

State Revolving Loan Fund (SRF) transactions are typically handled by a third-party administrator such as the Bank of New York Mellon. Even though the financial activity is handled by this third party, the transactions must be recorded on the Ledger of Receipts, Disbursements, and Balances and reported on the Annual Financial Report to properly reflect the financial activity of your city or town. Fund Numbers 2401 to 2499 are reserved for special revenue grants.

### **RECORDING OF AUDIT COSTS**

Inquiries have questioned the correct procedure for accounting for city and town audit costs (this does not apply to costs associated with the utility audit).

Indiana Code 5-11-4-3(b) guides this process and states, in part:

“... Immediately upon receipt of the certified statement, the county auditor shall issue a warrant on the county treasurer payable to the treasurer of state out of the general fund of the county for the amount stated in the certificate. The county auditor shall reimburse the county general fund, except for the expense of examination and investigation of county office, out of the money due the taxing units at the next semiannual settlement of the collection of taxes.”

Therefore, counties shall continue to forward Examination of Records (audit costs) payments to the Treasurer of State for city and town audits when billed by the State Board of Accounts. The county general fund shall then be reimbursed from property tax collections of the city or town at the next semiannual settlement.

To properly account for the city or town’s audit costs (not audit costs associated with the utility audit) the full amount of property and excise taxes (before audit costs) are to be receipted to the appropriate city or town funds. A disbursement for the Examination of Records is to be posted to city or town funds.

The Statement of Engagement Costs should be compared to the amount withheld for the Examination of Records to ensure the amounts agree. IC 5-11-4-4 provides that all disbursing offices are authorized to make payments required under this chapter without appropriation. Therefore, the examination of records costs would be considered an unappropriated disbursement.

### **YEAR-END DUTIES**

The following is a listing of duties and reports that occur each year end. All of the articles have been published in this issue.

- Monthly and Annual Engagement Uploads
- Annual Operational Report of Local Road and Street Operations
- Audit Preparation
- Federal and State Mileage Rates
- Cancellation of Warrants – Old Outstanding Checks
- Certification of Names and Addresses to County Treasurer
- Nepotism Annual Certification
- Contracting with a Unit Annual Certification
- Encumbered Appropriations – Balance Available
- Dormant Fund Balances – Transfers Authorized
- Fire Protection Contracts With Volunteer Fire Companies
- Internal Control Considerations

### **MONTHLY AND ANNUAL ENGAGEMENT UPLOADS**

State Examiner Directive 2018-1, as amended, requires the following files and governmental unit information to be uploaded monthly.

- Bank Reconcilements, Bank Statements, and Outstanding Check Lists
- Approved Board Minutes, please see the user guide for more information and examples
- Funds Ledger, summarizing total receipts, disbursements, and beginning and ending balances by fund

State Examiner Directive 2018-1, as amended, requires the following files and governmental unit information to be uploaded annually by March 1:

- Year-end Investment Statements
- Detail of Receipts for the year
- Detail of Disbursements for the year
- Current year Salary Ordinance (or Schedule) and Amendments
- Annual Vendor History Report
- Annual Payroll History Report, without social security numbers
- Annual Funds Ledger, summarizing year-to-date total receipts, year-to-date disbursements, and beginning and ending balances by fund
- Cities/Towns with courts: Court Trust Fund Subsidiary Detail as of December 31
- Optional: Excel Data Capture/Data Dump (in lieu of Detail of Receipts and Disbursements)

Annual files are due to be uploaded on Gateway no later than **March 1, 2023**.

Exceptions to certain requirements set forth in this Directive, such as for manual records, units audited by private CPA firms, and other exceptions, are discussed in the Gateway User Guide <https://gateway.ifionline.org/userguides/engagementguide>. Contact information for questions and other help, including a "Frequently Asked Questions" section, is also available on the User Guide.

If, after consulting the User Guide, you still have questions, please contact the helpdesk at [gateway@sboa.in.gov](mailto:gateway@sboa.in.gov).

Also, SBOA has separate YouTube videos on how to navigate the Monthly and Annual Upload application for both the monthly upload process and the annual upload process. Please see the articles entitled *SBOA YouTube Channel* and *Newly Elected Official Training Videos* in this Bulletin for more information.

### **ANNUAL OPERATIONAL REPORT OF LOCAL ROAD AND STREET OPERATIONS**

Indiana Code 8-17-4.1 requires an operational report shall be prepared by all cities and towns having a population of 15,000 or more with road and street responsibilities. The report shall be prepared on forms prescribed by the State Board of Accounts and must disclose all information considered necessary to reflect the financial condition and operations of the department.

The annual operational report for the preceding year will be electronically filed by June 1<sup>st</sup> with the Indiana State Board of Accounts through an online data management system developed and maintained by LTAP. The report is also to be filed with the governing body of the municipality and should be available to the public and media.

**ANNUAL OPERATIONAL REPORT OF LOCAL ROAD AND STREET OPERATIONS**  
**(continued)**

The annual operational report shall be prepared and filed on City and Town Form Number 225, entitled Highway (Local Road and Street) Annual Report. Form 225 has been revised significantly in order to be integrated into LTAP's data management system. A copy of the form can be obtained on our website at [www.in.gov/sboa](http://www.in.gov/sboa) by clicking on "Political Subdivision", then either "Cities" or "Towns", then "Highway Annual Operational Report".

Written instructions and videos are available in this section to aid you in the preparation and filing of this report. **Due to the revisions of the form, please do not use last year's report and simply update the data – you will need to download the revised form to use for reporting. Older versions of the form will not be accepted.**

**AUDIT PREPARATION**

When we arrive to conduct an audit, oftentimes officials have to spend time gathering information, records, and other documentation per our requests. Year-end is a good time to consider preparing some of those items in advance of our arrival so they can easily be produced when we arrive – saving time for you and the examiners.

Here are some items you can get ready at year-end that should help your engagement get off to a good start:

- Minutes of Council and other Board meetings
- Bank reconciliations complete and bank information (statements, etc.)
- Claims in order with supporting documentation available
- Copies of new ordinances, resolutions, or significant contracts from the year
- Written policies and procedures (internal controls, accrued leave, travel, etc.)
- Financial reports filed with other state or federal agencies
- Grant awards and agreements (federal and state)

For more information on preparing for an audit, please see the SBOA video entitled "How to Prepare for an Audit." This video may be accessed on our website or through the SBOA YouTube Channel. You may also wish to view our training from the Virtual Clerk Treasurer's Fall District Meeting in 2021 titled "Audits, Start to Finish." The materials and video are available on the cities or towns page under "Presentation and Training Materials".

**CANCELLATION OF WARRANTS – OLD OUTSTANDING CHECKS**

Pursuant to IC 5-11-10.5, all checks outstanding and unpaid for a period of two years as of December 31 of each year are void.

Not later than March 1 of each year, the clerk-treasurer shall prepare, or cause to be prepared, a list in duplicate of all checks outstanding for two or more years as of December 31 last preceding. The original copy shall be filed with the city or town council and the duplicate copy maintained by the clerk-treasurer of the city or town. The clerk-treasurer shall enter the amounts so listed as a receipt to the fund or funds upon which they were originally drawn and remove the checks from the list of outstanding checks. If the fund from which the check was originally drawn is not in existence or cannot be ascertained, the amount of the outstanding check shall be receipted into the general fund of the city or town.

**CANCELLATION OF WARRANTS – OLD OUTSTANDING CHECKS (continued)**

The list prepared must include:

1. the date of issue of each warrant or check;
2. the fund upon which the warrant or check was originally drawn;
3. the name of the payee;
4. the amount of each warrant or check issued; and
5. the total amount represented by the warrants or checks listed for each fund.

**CERTIFICATION OF NAMES AND ADDRESSES TO COUNTY TREASURER**

IC 6-1.1-22-14 states that on or before June 1 and December 1 of each year, the disbursing officer of each political subdivision shall certify the name and address of each person who has money due the person from the political subdivision to the county treasurer of each county in which the political subdivision is located. Upon the receipt of this information, the county treasurer shall search the records to ascertain if any person so certified is delinquent in the payment of property taxes.

IC 6-1.1-22-15 states that if the county treasurer finds that a person whose name is certified to him under 6-1.1-22-14 is delinquent in the payment of taxes, he shall certify the name of that person and the amount of delinquency to the official of the political subdivision who is to make payment to the person. The disbursing officer shall periodically make deductions from money due the person and shall pay the amount of these deductions to the county treasurer.

**NEPOTISM ANNUAL CERTIFICATION**

Indiana Code 36-1-20.2-16: "Each elected officer of the unit shall annually certify in writing, subject to the penalties for perjury, that the officer has not violated this chapter. An officer shall submit the certification to the executive of the unit not later than December 31 of each year." [emphasis added]

**CONTRACTING WITH A UNIT ANNUAL CERTIFICATION**

Indiana Code 36-1-21-6: "Each elected officer of the unit shall annually certify in writing, subject to the penalties for perjury, that the officer is in compliance with this chapter. An officer shall submit the certification to the executive of the unit not later than December 31 of each year." [emphasis added]

**ENCUMBERED APPROPRIATIONS – BALANCE AVAILABLE**

With the opening of a new budget year and a new set of ledgers, it is advantageous to review the unpaid purchase orders and contracts which remain on the ledgers as "encumbered."

Unpaid purchase orders and those items under contract are to be added for each appropriation account and the total carried to the new 2023 corresponding account. The actual unpaid amount of the purchase orders or contracts should be totaled and shown as a separate amount on the appropriation ledger sheet for 2023, with proper explanation, and added to the 2023 appropriation for the same purpose. By properly carrying out this procedure, the 2023 budget will not be expected to stand any expense not anticipated in making the budget.

We suggest the proper officials of the city or town make a listing of these encumbered items and make it part of the minutes in the last business meeting of the year. The Department of Local Government will request this information from each unit. The information will be used to validate the current year financial worksheet during following year's budget cycle.

Keep in mind the appropriations encumbered and carried forward can be used for no other purpose other than the purchase order or the contract for which they were appropriated.

**DORMANT FUND BALANCES - TRANSFERS AUTHORIZED**

IC 36-1-8-5 gives the city and town council the authority to order the transfer to the general fund or rainy day fund any unused and unencumbered balance in any fund raised by a general or special tax levy, the purposes of which have been fulfilled. This action may be taken by a city or town council at any public meeting.

IC 36-1-8-5 states in part:

“(a) This section applies to all funds raised by a general or special tax levy on all the taxable property of a political subdivision.

(b) Whenever the purposes of a tax levy have been fulfilled and an unused and unencumbered balance remains in the fund, the fiscal body of the political subdivision shall order the balance of that fund to be transferred as follows, unless a statute provides that it be transferred otherwise....

(2) Funds of a municipality, to the general fund or rainy day fund of the municipality.”

Please see the September 2015 *Cities and Towns Bulletin*, page 4 for more information about transfers to the Rainy Day fund.

**FIRE PROTECTION CONTRACTS WITH VOLUNTEER FIRE COMPANIES**

IC 36-8-12-3 authorizes cities and towns to enter into agreements with one or more volunteer fire companies that maintain adequate firefighting service for the use and operation of firefighting apparatus and equipment owned by the volunteer fire company, including the service of operators of the apparatus and equipment.

IC 36-8-12-4 states the contract must provide an amount determined by negotiation between the municipality and volunteer fire company. The consideration must include the amounts the unit is required to pay under IC 36-8-12 for insurance premiums and clothing, automobile, and other allowances.

IC 36-8-12-4.5 requires the contract to be (1) in writing and (2) for a fixed term.

If the contractual agreement is properly drawn, the problem of the governmental unit reporting clothing and auto allowances to the Internal Revenue Service and the Indiana Department of Revenue may be eliminated. Since the contractual payments are lump sum to the volunteer fire company, the volunteer fire company assumes the responsibility for making the payments of allowances to the volunteer firefighters and for reporting of such payments.

Year end is a good time to review existing contracts for fire protection. If renewals or changes in contracts are necessary, such renewals or changes should be made under the guidance of the city or town attorney. All agreements for fire protection are to be in writing and the agreements must be preserved as any other public documents. There is no statutory authority to make contractual payments to volunteer fire companies unless a written contract has been entered into.

**INTERNAL CONTROL CONSIDERATIONS**

At the end of the year, it is a good idea to evaluate the effectiveness of the internal controls of your city or town and determine whether changes are necessary to provide reasonable assurance that the objectives of your city or town are met. We also recommend documenting internal control procedures and reviewing for evidence of procedures being performed as intended.

Please note that IC 5-11-1-27 requires all “personnel,” as defined in the statute, to be trained on internal controls. Please make sure that all “personnel,” including newly hired employees, have viewed the SBOA approved training video. The SBOA approved training is required only one time, but we do always recommend additional training on internal controls as determined by your city or town.

**CERTIFIED REPORT OF NAMES, ADDRESSES, DUTIES, AND COMPENSATION OF PUBLIC EMPLOYEES**

All cities and towns must file with the State Examiner on or before January 31, Form 100-R, a Certified Report of Names, Addresses, Duties and Compensation of Public Employees. This report is required by IC 5-11-13. Only the business address of each officer or employee listed is to be included on the form.

Such report must indicate whether the city or town offers a health plan, a pension, and other benefits to full-time and part-time employees. In addition, as a part of the report, each city or town must upload a copy of the policies adopted under IC 36-1-20.2 (Nepotism) and IC 36-1-21 (Contracting). If your city or town has already uploaded a Nepotism Policy and a Contracting Policy, those policies will roll forward to your current submission. You will not be required to upload the policies again.

The report is to be filed electronically on the Gateway portal with the State Board of Accounts.

The Department of Local Government Finance may not approve a city or town's budget or any additional appropriations for the ensuing calendar year unless such report is filed and the Nepotism and Contracting policies have been implemented.

**ANNUAL FINANCIAL REPORT**

IC 5-3-1-3 provides that each city controller or city and town clerk-treasurer shall have published an annual report of the receipts and expenditures of such city or town within 60 days after the close of each calendar year.

IC 5-11-1-4 requires such reports to be filed electronically on the Gateway portal with the State Board of Accounts no later than sixty (60) days after the close of the year.

The "Cash and Investments Combined Statement" of the annual report is to be published one time in two newspapers unless there is only one newspaper in the city or town, in which case publication in the one newspaper is sufficient. If no newspaper is published in the city or town, then publication is to be made in a newspaper published in the county in which the city or town is located and that circulates within the city or town.

The "Cash and Investments Combined Statement" to be advertised is located in the Annual Report Outputs section under "Advertising Outputs".

The Department of Local Government Finance may not approve the budget or a supplemental appropriation of a city or town until the city or town files an annual report for the preceding calendar year.

**TIMELY FILING OF REQUIRED REPORTS****The Certified Report of Names, Addresses, Duties and Compensation of Public Employees (Form 100-R) and Annual Financial Report (AFR)**

Pursuant to IC 5-11-13-1, all governmental units in the state must file the certified personnel report (Form 100-R) in January of each year with the State Board of Accounts. Also, pursuant to IC 5-11-1-4, all local governmental units in the state must file an Annual Financial Report (AFR) not later than 60 days after the close of each fiscal year. The Indiana Gateway for Government Units (Gateway) system was created to collect both of these reports.

Due to the importance of these reports, the State Examiner has established the following procedures for reports not filed timely:

If either the Form 100-R or the AFR are not filed by the statutory due date, the State Board of Accounts will subpoena the fiscal officer to appear in our Indianapolis office with the information necessary to complete the Form 100-R or AFR, as applicable. This subpoena will be served either by certified mail or through personal service by a representative of the Office of the Attorney General (OAG).

If the fiscal officer does not appear or does not submit the Form 100-R or AFR in response to the subpoena, the State Examiner will send a notification to the OAG requesting the OAG to compel the fiscal officer to appear in court to answer as to his or her failure to file the report. The State Examiner may also send notification of the officer's failure to comply with the law to the local prosecuting attorney.

Indiana Code 5-11-1-10 addresses the penalty for not filing a required report and not following the directions of the State Examiner:

A public officer who:

1. fails to make, verify, and file with the state examiner any report required by this chapter;
2. fails to follow the directions of the state examiner in keeping the accounts of the officer's office;
3. refuses the state examiner, deputy examiner, field examiner, or private examiner access to the books, accounts, papers, documents, cash drawer, or cash of the officer's office; or
4. interferes with an examiner in the discharge of the examiner's official duties; commits a Class B infraction and forfeits office.

If you need submission rights or have any questions regarding the use of Gateway, please contact our help desk at [gateway@sboa.in.gov](mailto:gateway@sboa.in.gov). Please feel free to contact our Directors of Audit Services if you are having difficulty completing your Form 100-R or AFR. Contact information is available on our website at [www.in.gov/sboa](http://www.in.gov/sboa).

**PUBLICATION OF ANNUAL REPORT IN PAMPHLET FORM - SECOND CLASS CITIES**

IC 36-4-10-5(b)(5) requires the city fiscal officer of a second class city to "submit under oath to the city legislative body a report of the accounts of the city published in pamphlet form and showing revenues, receipts, expenditures, and the sources of revenues." Please note that this statute does not apply to Towns or Third Class Cities.

**FEDERAL AND STATE MILEAGE RATES**

The Federal business mileage rate is available at [www.irs.gov](http://www.irs.gov). The State mileage rate is 49 cents per mile as of the date of this publication.

**MONTHLY BANK RECONCILEMENTS**

Indiana Code 5-13-6-1(e) states that all local investment officers shall reconcile at least monthly the balance of public funds, as disclosed by the records of local officers, with the balance statements provided by the respective depositories.

In addition to compliance with statute, monthly bank reconcilements provide internal controls to achieve the safeguarding of public assets. We have received numerous reports that bank routing and account information is being used to create false checks that are clearing bank accounts and stealing public funds. If the unauthorized payments from the account are brought to the attention of the bank in a timely manner, the bank will replace the amount that was stolen. However, if you are not reconciling monthly, you would not be aware of these fraudulent transactions and the delay in reporting these fraudulent transaction to the bank may make it more difficult to get the bank to restore the funds to the bank account. Review the bank statement monthly and verify that all of your recorded deposits are credited to your account and all withdrawals from the account are transactions that trace to checks prepared by your office or electronic funds transfers that you have authorized. By doing this, you would catch any bank errors in a timely manner. In addition, you would be able to identify any fraudulent activity as early as possible.

**ESTABLISHING THE ESTIMATED COST OF CAPITAL ASSETS**

When it is not possible to determine the historical cost of capital assets owned by a governmental unit, the following procedure should be followed. Develop an inventory of all capital assets which are significant for which records of the historical costs are not available. Obtain an estimate of the replacement costs of these assets. Through inquiry determine the year or approximate year of acquisition. Then multiply the estimated replacement cost by the factor for the year of acquisition from the Table of Cost Indexes. The resulting amount will be the estimated cost of the asset. In some cases estimated replacement cost can be obtained from insurance policies; however, if estimated replacement costs are not available from insurance policies, you should obtain or make an estimate of the replacement costs.

As an example, if the replacement cost is estimated to be \$76,000.00 and the asset was constructed about 1948, then the estimated cost of the asset should be reported as \$6,080.00 (\$76,000.00 X .08 = \$6,080.00).

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1914 to 2021							
<u>Year</u>	<u>Index</u>	<u>Year</u>	<u>Index</u>	<u>Year</u>	<u>Index</u>	<u>Year</u>	<u>Index</u>
2021	0.96	1994	0.53	1967	0.12	1940	0.05
2020	0.94	1993	0.52	1966	0.12	1939	0.05
2019	0.93	1992	0.50	1965	0.11	1938	0.05
2018	0.91	1991	0.48	1964	0.11	1937	0.05
2017	0.89	1990	0.46	1963	0.11	1936	0.05
2016	0.88	1989	0.44	1962	0.11	1935	0.05
2015	0.87	1988	0.42	1961	0.11	1934	0.05
2014	0.86	1987	0.40	1960	0.11	1933	0.05
2013	0.85	1986	0.40	1959	0.11	1932	0.06
2012	0.83	1985	0.38	1958	0.10	1931	0.06
2011	0.81	1984	0.37	1957	0.10	1930	0.06
2010	0.79	1983	0.36	1956	0.10	1929	0.06
2009	0.79	1982	0.33	1955	0.10	1928	0.06
2008	0.77	1981	0.30	1954	0.10	1927	0.06
2007	0.74	1980	0.27	1953	0.10	1926	0.06
2006	0.72	1979	0.24	1952	0.10	1925	0.06
2005	0.70	1978	0.22	1951	0.09	1924	0.06
2004	0.68	1977	0.21	1950	0.09	1923	0.06
2003	0.66	1976	0.20	1949	0.09	1922	0.06
2002	0.65	1975	0.18	1948	0.08	1921	0.07
2001	0.64	1974	0.16	1947	0.07	1920	0.06
2000	0.62	1973	0.15	1946	0.07	1919	0.06
1999	0.60	1972	0.15	1945	0.06	1918	0.05
1998	0.59	1971	0.14	1944	0.06	1917	0.04
1997	0.58	1970	0.13	1943	0.06	1916	0.04
1996	0.56	1969	0.13	1942	0.05	1915	0.04
1995	0.55	1968	0.12	1941	0.05	1914	0.04

### **VACATION, SICK, AND OTHER LEAVE**

Ordinances Required. Employees of the political subdivisions of the state may be granted a vacation with pay, sick leave, paid holidays, and other similar benefits by ordinance of the legislative body of a city or town or by the controlling board of municipally owned utility, or by the board of directors or regents of a cemetery. Payment of vacation benefits so granted may be made in advance of any vacation taken by such an employee. (IC 5-10-6-1).

It is noted the use of “may” provides authority without mandating such fringe benefits.

It is imperative for all cities and towns to have written guidelines and policies concerning fringe benefits, vacation and sick leave. Such policies should be in the form of an ordinance as required by the statute.

Also, it is our audit position that if an employee uses leave time, he/she should not be working when such leave time is scheduled. Such employee cannot be compensated twice for the same work period.

City Officers and Employees – Prior Payment of Vacation Leave – Authority. IC 36-4-8-9(a) states: “One (1) to three (3) days before the vacation leave period of a city officer or employee begins, the city may pay him the amount of compensation he will earn while he is on vacation.”

Town Officers and Employees – Prior Payment of Vacation Leave – Authority. IC 36-5-4-7 states: “One (1) to three (3) days before the vacation leave period of a town officer or employee begins, the town may pay him the amount of compensation he will earn while he is on vacation leave.”

### **ALCOHOL AND DRUG SERVICES PROGRAM**

IC 12-23-14 authorizes a court having misdemeanor jurisdiction in a city to establish an alcohol and drug services program either under the court’s operation or under private contract. The court shall establish uniform rules for the operation of the program.

An alcohol and drug services program is subject to the regulatory powers of the Indiana Judicial Center. The Board of Directors of the Judicial Conference of Indiana shall adopt rules concerning standards, requirements, and procedures for initial certification, recertification, and decertification of alcohol and drug services programs.

A court may require an eligible individual to pay a fee for a service of a program. If a fee is required, the court shall adopt by court rule a schedule of fees to be assessed for program services. The fee may not exceed four hundred dollars (\$400). All fees shall be deposited in the city user fee fund.

The costs of an alcohol and drug services program shall be paid out of the city general fund and may be supplemented by payment from the city user fee fund upon appropriation made under IC 33-37-8.

### **PUBLIC RECORDS GO WITH THE OFFICE**

Sometimes when an official is replaced by reason of resignation, election, or for other reasons, we find the official’s records are withheld until they can be audited or are found to be missing completely.

It is not necessary that the records be audited immediately when an official is replaced. Audits are performed in accordance to statutory requirements and SBOA’s audit assignment program. When an official assumes custody of an office, many of the forms and records are continuous. Each fiscal officer executes a bond that the officer will render faithful accounting. Should the officer relinquish his office, his

**PUBLIC RECORDS GO WITH THE OFFICE (continued)**

acts are a matter of record and nothing can be done to change the various transactions that have been previously made.

Regardless of the capacity filled by an official, upon termination of his service, all records and forms are to be surrendered to his successor. For various statutes requiring this transfer, see IC 36-4-10-5(6), City Controller; IC 36-4-10-4(4), City Clerk and City Clerk-Treasurer; and IC 36-5-4-10, Town Clerk-Treasurer. IC 5-15-6-8 states that the penalty for a Public Official who knowingly or intentionally destroys or damages any public record is a Level 6 felony.

**TEMPORARY LOANS – UTILITIES**

Since the temporary loan provisions of IC 36-1-8-4 would not apply to funds of a municipally owned utility and there are no statutes authorizing or prohibiting loans from a city or town fund to a municipally owned utility, a home rule ordinance could be adopted authorizing such loans. Such ordinance should list the amount and term of the loan and interest rate, if interest is to be charged.

Please note that recurring cash flow problems experienced by a municipally owned utility could indicate a need for an increase in utility rates. IC 8-1.5-3-8 and IC 36-9-23-25 require the boards over municipally owned utilities and wastewater utilities to set rates in an amount which will ensure sound fiscal condition for the utilities.

**RIGHT OF WAY EASEMENTS - RECORDING**

Whenever a right-of-way or easement for a state, county, or municipal highway is acquired, an accurate description of all rights-of-way and easements shall be filed in the office of the recorder of the county in which the real property is located. The description shall be recorded in the deed records of the county. The county recorder may not charge a fee for filing and recording the description. (IC 8-23-23-1)

**INTEREST ON INVESTMENTS**

Interest on investments should not be added automatically to the investment. Instead, interest on investments should be paid to the governmental unit at each maturity date and posted to the appropriate fund.

Interest is to be credited to the political subdivision funds as indicated below:

1. All interest derived from an investment by a political subdivision under the authority granted by IC 5-13-9-3 shall be deposited, except as otherwise provided by law, in the general fund of the political subdivision or in any other fund the governing board designated specifically or by rule, subject to the modifications and limitations in IC 5-13-9-6. [IC 5-13-9-6(a)]
2. Interest from investments of funds of a political subdivision that are traceable to Untied States government funds must be receipted to the fund of which they are a part, if required by federal law or regulation. [IC 5-13-9-6(b)]
3. Interest from investments of funds controlled by court orders must be receipted to that fund unless otherwise designated by the court order. [IC 5-13-9-6(b)]

**INTEREST ON INVESTMENTS (continued)**

4. A political subdivision may apply the interest derived from the investment of the proceeds from bonded indebtedness or local tax levies to the appropriate redemption bond interest or sinking fund for the bonded indebtedness. [IC 5-13-9-6(e)]

Note: Regardless of IC 5-13-9-6(e), terms of an existing bond resolution must be followed. The bond resolution should be reviewed and its terms and conditions adhered to without exception.

5. If meter deposits of a municipally owned utility are invested, the interest earned on the investment may be applied to and used in the operation or depreciation fund of the municipally owned utility as determined by its governing body. [IC 5-13-9-6(f)]

Interest from the investment of public funds may not be paid personally or for the benefit of any public officer." [IC 5-13-9-6(g)]

**RIVERBOAT GAMBLING – ADMISSION TAXES**

Admission tax money paid to a unit of local government under IC 4-33-12-6, IC 4-33-12-8, or IC 4-33-12-8.5:

- (1) must be paid to the fiscal officer of the unit and may be deposited in the unit's general fund or a riverboat fund established by the city or county under IC 36-1-8-9, or both;
- (2) may not be used to reduce the unit's maximum levy under IC 6-1.1-18.5 but may be used at the discretion of the unit to reduce the property tax levy of the unit for a particular year;
- (3) may be used for any legal or corporate purpose of the unit, including the pledge of money to bonds, leases, or other obligations under IC 5-1-14-4; (except as provided in IC 4-33-12.5 for cities and towns in Lake County) and
- (4) is considered miscellaneous revenue.

Municipalities in Dearborn County have special provisions in IC 4-33-12-9(i).

**BARRETT LAW FUNDS – OFFICIAL BOND**

IC 36-9-37-7 provides that the collecting and disbursing officer of Barrett Law funds in a city or town shall give a separate official bond in an amount to be fixed by the city or town council of such city or town pursuant to the provisions of IC 5-4-1-18(c). Said bond shall be filed and recorded in the office of the county recorder, as required by IC 5-4-1-5.1.

The amount of coverage must equal \$30,000 for each million dollars of receipts of the officer's office during the last complete fiscal year before the purchase of the bond.

The amount of coverage may not be less than \$30,000 nor more than \$300,000 unless the fiscal body approves a greater amount of coverage. (IC 5-4-1-18)

**INDEX TO BULLETINS**

An index to the following issues of the Cities and Towns Bulletin will be available at [www.in.gov/sboa](http://www.in.gov/sboa):

- 2012 – March, June, September, December
- 2013 – March, June, September, December
- 2014 – March, June, September, December
- 2015 – March, June, September, December
- 2016 – March, June, September, December
- 2017 – March, June, September, December
- 2018 – March, June, September, December
- 2019 – March, June, September, December
- 2020 – March, June, September, December
- 2021 – March, June, September, December
- 2022 – March, June, September, December

The articles appearing in the year 2012 and prior issues have been revised and reprinted in later issues. Also, articles revised in later issues that are obsolete have been omitted from the index. Please discard all issues prior to March 2013.

**HAPPY HOLIDAYS**

We would like to take this opportunity to look back on the many warm associations that we have been blessed with. The outstanding cooperation and help that we are extended by city and town officials is truly appreciated.

From each of us at the SBOA to each of you and your staff, we send our best wishes for the holidays and our sincere wishes for a prosperous and Happy New Year.

**RATES FOR LEGAL ADVERTISING**  
Effective January 1, 2023

The following rates, effective January 1, 2023, were computed based upon the statutorily authorized 2.75% increase allowed by IC 5-3-1-1(b)(4). Any percentage increase other than the 2.75% will require a separate computation by the State Board of Accounts. A newspaper, locality newspaper, or qualified publication may, effective January 1 of any year increase the basic charges by not more than 2.75% more than the basic charges that were in effect during the previous year.

6 Pica		3 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.3377	0.5053	0.6741	0.8430	
7.5	0.3152	0.4716	0.6292	0.7868	
8	0.2955	0.4421	0.5899	0.7376	
9	0.2627	0.3930	0.5243	0.6557	
10	0.2364	0.3537	0.4719	0.5901	
12	0.1970	0.2948	0.3933	0.4918	
Rate/Square	7.88	11.79	15.73	19.67	

6 Pica		4 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.3420	0.5118	0.6828	0.8538	
7.5	0.3192	0.4776	0.6373	0.7969	
8	0.2993	0.4478	0.5974	0.7471	
9	0.2660	0.3980	0.5310	0.6641	
10	0.2394	0.3582	0.4779	0.5977	
12	0.1995	0.2985	0.3983	0.4980	
Rate/Square	7.88	11.79	15.73	19.67	

6 Pica		7 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.3555	0.5320	0.7097	0.8875	
7.5	0.3318	0.4965	0.6624	0.8283	
8	0.3111	0.4655	0.6210	0.7766	
9	0.2765	0.4138	0.5520	0.6903	
10	0.2489	0.3724	0.4968	0.6213	
12	0.2074	0.3103	0.4140	0.5177	
Rate/Square	7.88	11.79	15.73	19.67	

6 Pica		9 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.3647	0.5457	0.7281	0.9104	
7.5	0.3404	0.5093	0.6795	0.8497	
8	0.3191	0.4775	0.6371	0.7966	
9	0.2837	0.4244	0.5663	0.7081	
10	0.2553	0.3820	0.5097	0.6373	
12	0.2128	0.3183	0.4247	0.5311	
Rate/Square	7.88	11.79	15.73	19.67	

6 Pica		10 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.3691	0.5522	0.7367	0.9212	
7.5	0.3445	0.5154	0.6876	0.8598	
8	0.3229	0.4832	0.6446	0.8061	
9	0.2870	0.4295	0.5730	0.7165	
10	0.2583	0.3865	0.5157	0.6449	
12	0.2153	0.3221	0.4297	0.5374	
Rate/Square	7.88	11.79	15.73	19.67	

6 Pica		11 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.3739	0.5595	0.7464	0.9334	
7.5	0.3490	0.5222	0.6967	0.8711	
8	0.3272	0.4895	0.6531	0.8167	
9	0.2908	0.4351	0.5805	0.7260	
10	0.2617	0.3916	0.5225	0.6534	
12	0.2181	0.3263	0.4354	0.5445	
Rate/Square	7.88	11.79	15.73	19.67	

**7 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.3782	0.5659	0.7550	0.9442
7.5	0.3530	0.5282	0.7047	0.8812
8	0.3310	0.4952	0.6607	0.8261
9	0.2942	0.4402	0.5873	0.7343
10	0.2648	0.3961	0.5285	0.6609
12	0.2206	0.3301	0.4404	0.5508
Rate/Square	7.88	11.79	15.73	19.67

**7 Pica                      2 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.3874	0.5797	0.7734	0.9671
7.5	0.3616	0.5410	0.7218	0.9026
8	0.3390	0.5072	0.6767	0.8462
9	0.3013	0.4508	0.6015	0.7522
10	0.2712	0.4058	0.5414	0.6770
12	0.2260	0.3381	0.4511	0.5641
Rate/Square	7.88	11.79	15.73	19.67

**7 Pica                      6 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.4053	0.6063	0.8090	1.0116
7.5	0.3782	0.5659	0.7550	0.9442
8	0.3546	0.5306	0.7079	0.8852
9	0.3152	0.4716	0.6292	0.7868
10	0.2837	0.4244	0.5663	0.7081
12	0.2364	0.3537	0.4719	0.5901
Rate/Square	7.88	11.79	15.73	19.67

**7 Pica                      10 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.4231	0.6330	0.8446	1.0561
7.5	0.3949	0.5908	0.7883	0.9857
8	0.3702	0.5539	0.7390	0.9241
9	0.3291	0.4924	0.6569	0.8214
10	0.2962	0.4431	0.5912	0.7393
12	0.2468	0.3693	0.4927	0.6161
Rate/Square	7.88	11.79	15.73	19.67

**8 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.4458	0.6670	0.8899	1.1128
7.5	0.4161	0.6225	0.8305	1.0386
8	0.3901	0.5836	0.7786	0.9737
9	0.3467	0.5188	0.6921	0.8655
10	0.3120	0.4669	0.6229	0.7789
12	0.2600	0.3891	0.5191	0.6491
Rate/Square	7.88	11.79	15.73	19.67

**8 Pica                      5 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.4550	0.6807	0.9082	1.1357
7.5	0.4246	0.6353	0.8477	1.0600
8	0.3981	0.5956	0.7947	0.9937
9	0.3539	0.5294	0.7064	0.8833
10	0.3185	0.4765	0.6357	0.7950
12	0.2654	0.3971	0.5298	0.6625
Rate/Square	7.88	11.79	15.73	19.67

**8 Pica                      6 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.4593	0.6872	0.9168	1.1465
7.5	0.4287	0.6414	0.8557	1.0700
8	0.4019	0.6013	0.8022	1.0032
9	0.3572	0.5345	0.7131	0.8917
10	0.3215	0.4810	0.6418	0.8025
12	0.2679	0.4009	0.5348	0.6688
Rate/Square	7.88	11.79	15.73	19.67

**9 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.4863	0.7276	0.9708	1.2139
7.5	0.4539	0.6791	0.9060	1.1330
8	0.4255	0.6367	0.8494	1.0622
9	0.3782	0.5659	0.7550	0.9442
10	0.3404	0.5093	0.6795	0.8497
12	0.2837	0.4244	0.5663	0.7081
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      2 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4955	0.7414	0.9891	1.2368
7.5	0.4625	0.6919	0.9232	1.1544
8	0.4336	0.6487	0.8655	1.0822
9	0.3854	0.5766	0.7693	0.9620
10	0.3468	0.5189	0.6924	0.8658
12	0.2890	0.4325	0.5770	0.7215
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      4 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5041	0.7543	1.0064	1.2584
7.5	0.4705	0.7040	0.9393	1.1745
8	0.4411	0.6600	0.8806	1.1011
9	0.3921	0.5867	0.7827	0.9788
10	0.3529	0.5280	0.7045	0.8809
12	0.2941	0.4400	0.5870	0.7341
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      5 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5090	0.7616	1.0161	1.2706
7.5	0.4751	0.7108	0.9483	1.1859
8	0.4454	0.6664	0.8891	1.1117
9	0.3959	0.5923	0.7903	0.9882
10	0.3563	0.5331	0.7112	0.8894
12	0.2969	0.4442	0.5927	0.7412
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5133	0.7680	1.0247	1.2814
7.5	0.4791	0.7168	0.9564	1.1959
8	0.4492	0.6720	0.8966	1.1212
9	0.3993	0.5974	0.7970	0.9966
10	0.3593	0.5376	0.7173	0.8970
12	0.2994	0.4480	0.5977	0.7475
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      8 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5225	0.7818	1.0430	1.3043
7.5	0.4877	0.7297	0.9735	1.2173
8	0.4572	0.6841	0.9127	1.1413
9	0.4064	0.6080	0.8112	1.0144
10	0.3658	0.5472	0.7301	0.9130
12	0.3048	0.4560	0.6084	0.7608
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      9 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5268	0.7882	1.0517	1.3151
7.5	0.4917	0.7357	0.9816	1.2274
8	0.4610	0.6897	0.9202	1.1507
9	0.4098	0.6131	0.8180	1.0228
10	0.3688	0.5518	0.7362	0.9206
12	0.3073	0.4598	0.6135	0.7671
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      10 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5312	0.7947	1.0603	1.3259
7.5	0.4957	0.7417	0.9896	1.2375
8	0.4648	0.6954	0.9278	1.1601
9	0.4131	0.6181	0.8247	1.0312
10	0.3718	0.5563	0.7422	0.9281
12	0.3098	0.4636	0.6185	0.7734
Rate/Square	7.88	11.79	15.73	19.67

9 Pica                      11 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5360	0.8020	1.0700	1.3380
7.5	0.5003	0.7485	0.9987	1.2488
8	0.4690	0.7017	0.9362	1.1708
9	0.4169	0.6238	0.8322	1.0407
10	0.3752	0.5614	0.7490	0.9366
12	0.3127	0.4678	0.6242	0.7805
Rate/Square	7.88	11.79	15.73	19.67

10 Pica		0 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.5403	0.8085	1.0786	1.3488	
7.5	0.5043	0.7546	1.0067	1.2589	
8	0.4728	0.7074	0.9438	1.1802	
9	0.4203	0.6288	0.8389	1.0491	
10	0.3782	0.5659	0.7550	0.9442	
12	0.3152	0.4716	0.6292	0.7868	
Rate/Square	7.88	11.79	15.73	19.67	

10 Pica		5 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.5630	0.8424	1.1239	1.4054	
7.5	0.5255	0.7863	1.0490	1.3118	
8	0.4927	0.7371	0.9834	1.2298	
9	0.4379	0.6552	0.8742	1.0931	
10	0.3941	0.5897	0.7868	0.9838	
12	0.3284	0.4914	0.6556	0.8198	
Rate/Square	7.88	11.79	15.73	19.67	

10 Pica		6 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.5674	0.8489	1.1326	1.4162	
7.5	0.5295	0.7923	1.0571	1.3218	
8	0.4964	0.7428	0.9910	1.2392	
9	0.4413	0.6602	0.8809	1.1015	
10	0.3972	0.5942	0.7928	0.9914	
12	0.3310	0.4952	0.6607	0.8261	
Rate/Square	7.88	11.79	15.73	19.67	

11 Pica		0 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.5944	0.8893	1.1865	1.4837	
7.5	0.5548	0.8300	1.1074	1.3848	
8	0.5201	0.7781	1.0382	1.2982	
9	0.4623	0.6917	0.9228	1.1540	
10	0.4161	0.6225	0.8305	1.0386	
12	0.3467	0.5188	0.6921	0.8655	
Rate/Square	7.88	11.79	15.73	19.67	

11 Pica		3 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.6079	0.9095	1.2135	1.5174	
7.5	0.5674	0.8489	1.1326	1.4162	
8	0.5319	0.7958	1.0618	1.3277	
9	0.4728	0.7074	0.9438	1.1802	
10	0.4255	0.6367	0.8494	1.0622	
12	0.3546	0.5306	0.7079	0.8852	
Rate/Square	7.88	11.79	15.73	19.67	

11 Pica		7 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.6257	0.9362	1.2491	1.5619	
7.5	0.5840	0.8738	1.1658	1.4578	
8	0.5475	0.8192	1.0929	1.3667	
9	0.4867	0.7282	0.9715	1.2148	
10	0.4380	0.6553	0.8743	1.0933	
12	0.3650	0.5461	0.7286	0.9111	
Rate/Square	7.88	11.79	15.73	19.67	

12 Pica		5 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.6711	1.0041	1.3397	1.6752	
7.5	0.6264	0.9372	1.2503	1.5635	
8	0.5872	0.8786	1.1722	1.4658	
9	0.5220	0.7810	1.0420	1.3029	
10	0.4698	0.7029	0.9378	1.1726	
12	0.3915	0.5857	0.7815	0.9772	
Rate/Square	7.88	11.79	15.73	19.67	

12 Pica		9 Point Column			
Type Size	Number of Insertions				
	1	2	3	4	
7	0.6889	1.0308	1.3753	1.7197	
7.5	0.6430	0.9621	1.2836	1.6051	
8	0.6028	0.9019	1.2033	1.5048	
9	0.5358	0.8017	1.0696	1.3376	
10	0.4823	0.7215	0.9627	1.2038	
12	0.4019	0.6013	0.8022	1.0032	
Rate/Square	7.88	11.79	15.73	19.67	

**13 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.7024	1.0510	1.4022	1.7534
7.5	0.6556	0.9809	1.3087	1.6365
8	0.6146	0.9196	1.2269	1.5343
9	0.5463	0.8174	1.0906	1.3638
10	0.4917	0.7357	0.9816	1.2274
12	0.4098	0.6131	0.8180	1.0228
Rate/Square	7.88	11.79	15.73	19.67

**13 Pica                      2 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.7116	1.0647	1.4206	1.7764
7.5	0.6642	0.9938	1.3259	1.6579
8	0.6227	0.9316	1.2430	1.5543
9	0.5535	0.8281	1.1049	1.3816
10	0.4981	0.7453	0.9944	1.2435
12	0.4151	0.6211	0.8287	1.0362
Rate/Square	7.88	11.79	15.73	19.67

**14 Pica                      2 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.7657	1.1456	1.5284	1.9112
7.5	0.7146	1.0692	1.4265	1.7838
8	0.6700	1.0024	1.3374	1.6723
9	0.5955	0.8910	1.1888	1.4865
10	0.5360	0.8019	1.0699	1.3379
12	0.4466	0.6683	0.8916	1.1149
Rate/Square	7.88	11.79	15.73	19.67

**14 Pica                      5 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.7792	1.1658	1.5554	1.9450
7.5	0.7272	1.0881	1.4517	1.8153
8	0.6818	1.0201	1.3610	1.7018
9	0.6060	0.9067	1.2097	1.5128
10	0.5454	0.8161	1.0888	1.3615
12	0.4545	0.6800	0.9073	1.1346
Rate/Square	7.88	11.79	15.73	19.67

**14 Pica                      7 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.7878	1.1787	1.5726	1.9666
7.5	0.7353	1.1001	1.4678	1.8354
8	0.6893	1.0314	1.3761	1.7207
9	0.6127	0.9168	1.2232	1.5295
10	0.5515	0.8251	1.1008	1.3766
12	0.4596	0.6876	0.9174	1.1472
Rate/Square	7.88	11.79	15.73	19.67

**14 Pica                      9 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.7970	1.1925	1.5910	1.9895
7.5	0.7439	1.1130	1.4849	1.8568
8	0.6974	1.0434	1.3921	1.7408
9	0.6199	0.9275	1.2374	1.5474
10	0.5579	0.8347	1.1137	1.3926
12	0.4649	0.6956	0.9281	1.1605
Rate/Square	7.88	11.79	15.73	19.67

**15 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.8105	1.2127	1.6179	2.0232
7.5	0.7565	1.1318	1.5101	1.8883
8	0.7092	1.0611	1.4157	1.7703
9	0.6304	0.9432	1.2584	1.5736
10	0.5674	0.8489	1.1326	1.4162
12	0.4728	0.7074	0.9438	1.1802
Rate/Square	7.88	11.79	15.73	19.67

**15 Pica                      9 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.8510	1.2733	1.6988	2.1244
7.5	0.7943	1.1884	1.5856	1.9827
8	0.7447	1.1142	1.4865	1.8588
9	0.6619	0.9904	1.3213	1.6523
10	0.5957	0.8913	1.1892	1.4871
12	0.4964	0.7428	0.9910	1.2392
Rate/Square	7.88	11.79	15.73	19.67

**16 Pica                      5 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.8872	1.3275	1.7711	2.2147
7.5	0.8281	1.2390	1.6530	2.0671
8	0.7763	1.1616	1.5497	1.9379
9	0.6901	1.0325	1.3775	1.7226
10	0.6211	0.9292	1.2398	1.5503
12	0.5176	0.7744	1.0331	1.2919
Rate/Square	7.88	11.79	15.73	19.67

**17 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	0.9321	1.3946	1.8606	2.3267
7.5	0.8700	1.3016	1.7366	2.1716
8	0.8156	1.2203	1.6281	2.0358
9	0.7250	1.0847	1.4472	1.8096
10	0.6525	0.9762	1.3024	1.6287
12	0.5437	0.8135	1.0854	1.3572
Rate/Square	7.88	11.79	15.73	19.67

**18 Pica                      9 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.0131	1.5159	2.0224	2.5290
7.5	0.9456	1.4148	1.8876	2.3604
8	0.8865	1.3264	1.7696	2.2129
9	0.7880	1.1790	1.5730	1.9670
10	0.7092	1.0611	1.4157	1.7703
12	0.5910	0.8843	1.1798	1.4753
Rate/Square	7.88	11.79	15.73	19.67

**19 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.0267	1.5361	2.0494	2.5627
7.5	0.9582	1.4337	1.9128	2.3919
8	0.8983	1.3441	1.7932	2.2424
9	0.7985	1.1947	1.5940	1.9932
10	0.7187	1.0752	1.4346	1.7939
12	0.5989	0.8960	1.1955	1.4949
Rate/Square	7.88	11.79	15.73	19.67

**19 Pica                      4 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.0445	1.5627	2.0850	2.6072
7.5	0.9749	1.4586	1.9460	2.4334
8	0.9139	1.3674	1.8244	2.2813
9	0.8124	1.2155	1.6217	2.0278
10	0.7311	1.0939	1.4595	1.8251
12	0.6093	0.9116	1.2162	1.5209
Rate/Square	7.88	11.79	15.73	19.67

**19 Pica                      6 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.0537	1.5765	2.1033	2.6302
7.5	0.9834	1.4714	1.9631	2.4548
8	0.9220	1.3794	1.8404	2.3014
9	0.8195	1.2262	1.6359	2.0457
10	0.7376	1.1035	1.4723	1.8411
12	0.6146	0.9196	1.2269	1.5343
Rate/Square	7.88	11.79	15.73	19.67

**19 Pica                      9 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.0672	1.5967	2.1303	2.6639
7.5	0.9960	1.4903	1.9883	2.4863
8	0.9338	1.3971	1.8640	2.3309
9	0.8300	1.2419	1.6569	2.0719
10	0.7470	1.1177	1.4912	1.8647
12	0.6225	0.9314	1.2427	1.5539
Rate/Square	7.88	11.79	15.73	19.67

**19 Pica                      10 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.0715	1.6032	2.1389	2.6747
7.5	1.0001	1.4963	1.9963	2.4964
8	0.9376	1.4028	1.8716	2.3403
9	0.8334	1.2469	1.6636	2.0803
10	0.7500	1.1222	1.4972	1.8723
12	0.6250	0.9352	1.2477	1.5602
Rate/Square	7.88	11.79	15.73	19.67

19 Pica	11 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.0764	1.6104	2.1486	2.6868
7.5	1.0046	1.5031	2.0054	2.5077
8	0.9418	1.4091	1.8800	2.3510
9	0.8372	1.2526	1.6712	2.0897
10	0.7535	1.1273	1.5040	1.8808
12	0.6279	0.9394	1.2534	1.5673
Rate/Square	7.88	11.79	15.73	19.67

20 Pica	3 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.0942	1.6371	2.1842	2.7313
7.5	1.0212	1.5280	2.0386	2.5492
8	0.9574	1.4325	1.9112	2.3899
9	0.8510	1.2733	1.6988	2.1244
10	0.7659	1.1460	1.5290	1.9119
12	0.6383	0.9550	1.2741	1.5933
Rate/Square	7.88	11.79	15.73	19.67

20 Pica	4 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.0985	1.6436	2.1929	2.7421
7.5	1.0253	1.5340	2.0467	2.5593
8	0.9612	1.4381	1.9187	2.3993
9	0.8544	1.2784	1.7056	2.1328
10	0.7690	1.1505	1.5350	1.9195
12	0.6408	0.9588	1.2792	1.5996
Rate/Square	7.88	11.79	15.73	19.67

20 Pica	6 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.1077	1.6573	2.2112	2.7650
7.5	1.0339	1.5468	2.0638	2.5807
8	0.9692	1.4502	1.9348	2.4194
9	0.8615	1.2890	1.7198	2.1506
10	0.7754	1.1601	1.5478	1.9355
12	0.6462	0.9668	1.2899	1.6129
Rate/Square	7.88	11.79	15.73	19.67

21 Pica	6 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.1617	1.7382	2.3191	2.8999
7.5	1.0843	1.6223	2.1644	2.7066
8	1.0165	1.5209	2.0292	2.5374
9	0.9036	1.3519	1.8037	2.2555
10	0.8132	1.2167	1.6233	2.0299
12	0.6777	1.0139	1.3528	1.6916
Rate/Square	7.88	11.79	15.73	19.67

21 Pica	7 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.1661	1.7447	2.3277	2.9107
7.5	1.0883	1.6283	2.1725	2.7167
8	1.0203	1.5266	2.0367	2.5469
9	0.9069	1.3570	1.8104	2.2639
10	0.8162	1.2213	1.6294	2.0375
12	0.6802	1.0177	1.3578	1.6979
Rate/Square	7.88	11.79	15.73	19.67

22 Pica	0 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.1888	1.7786	2.3730	2.9674
7.5	1.1095	1.6600	2.2148	2.7695
8	1.0402	1.5563	2.0764	2.5964
9	0.9246	1.3834	1.8457	2.3079
10	0.8321	1.2450	1.6611	2.0772
12	0.6934	1.0375	1.3842	1.7310
Rate/Square	7.88	11.79	15.73	19.67

22 Pica	1 Point Column
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Type Size	Number of Insertions			
	1	2	3	4
7	1.1931	1.7851	2.3816	2.9782
7.5	1.1135	1.6661	2.2228	2.7796
8	1.0439	1.5619	2.0839	2.6059
9	0.9279	1.3884	1.8524	2.3163
10	0.8352	1.2496	1.6671	2.0847
12	0.6960	1.0413	1.3893	1.7373
Rate/Square	7.88	11.79	15.73	19.67

**22 Pica                      10 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.2336	1.8457	2.4625	3.0793
7.5	1.1514	1.7227	2.2983	2.8740
8	1.0794	1.6150	2.1547	2.6944
9	0.9595	1.4356	1.9153	2.3950
10	0.8635	1.2920	1.7238	2.1555
12	0.7196	1.0767	1.4365	1.7963
Rate/Square	7.88	11.79	15.73	19.67

**23 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.2428	1.8595	2.4808	3.1022
7.5	1.1599	1.7355	2.3155	2.8954
8	1.0874	1.6270	2.1707	2.7145
9	0.9666	1.4462	1.9295	2.4129
10	0.8700	1.3016	1.7366	2.1716
12	0.7250	1.0847	1.4472	1.8096
Rate/Square	7.88	11.79	15.73	19.67

**23 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.2563	1.8797	2.5078	3.1360
7.5	1.1725	1.7544	2.3406	2.9269
8	1.0993	1.6447	2.1943	2.7440
9	0.9771	1.4620	1.9505	2.4391
10	0.8794	1.3158	1.7555	2.1952
12	0.7328	1.0965	1.4629	1.8293
Rate/Square	7.88	11.79	15.73	19.67

**24 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.2968	1.9403	2.5887	3.2371
7.5	1.2104	1.8109	2.4161	3.0213
8	1.1347	1.6978	2.2651	2.8325
9	1.0086	1.5091	2.0134	2.5178
10	0.9078	1.3582	1.8121	2.2660
12	0.7565	1.1318	1.5101	1.8883
Rate/Square	7.88	11.79	15.73	19.67

**25 Pica                      6 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.3779	2.0616	2.7505	3.4394
7.5	1.2860	1.9241	2.5671	3.2101
8	1.2056	1.8039	2.4067	3.0095
9	1.0717	1.6034	2.1393	2.6751
10	0.9645	1.4431	1.9254	2.4076
12	0.8038	1.2026	1.6045	2.0063
Rate/Square	7.88	11.79	15.73	19.67

**26 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.4049	2.1020	2.8044	3.5069
7.5	1.3112	1.9619	2.6175	3.2731
8	1.2293	1.8392	2.4539	3.0685
9	1.0927	1.6349	2.1812	2.7276
10	0.9834	1.4714	1.9631	2.4548
12	0.8195	1.2262	1.6359	2.0457
Rate/Square	7.88	11.79	15.73	19.67

**26 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.4184	2.1222	2.8314	3.5406
7.5	1.3238	1.9807	2.6426	3.3046
8	1.2411	1.8569	2.4775	3.0980
9	1.1032	1.6506	2.2022	2.7538
10	0.9929	1.4855	1.9820	2.4784
12	0.8274	1.2380	1.6517	2.0654
Rate/Square	7.88	11.79	15.73	19.67

**29 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.5805	2.3647	3.1550	3.9452
7.5	1.4751	2.2071	2.9447	3.6822
8	1.3829	2.0691	2.7606	3.4521
9	1.2293	1.8392	2.4539	3.0685
10	1.1064	1.6553	2.2085	2.7617
12	0.9220	1.3794	1.8404	2.3014
Rate/Square	7.88	11.79	15.73	19.67

**29 Pica                      4 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.5848	2.3712	3.1636	3.9560
7.5	1.4792	2.2131	2.9527	3.6923
8	1.3867	2.0748	2.7682	3.4615
9	1.2326	1.8443	2.4606	3.0769
10	1.1094	1.6598	2.2145	2.7692
12	0.9245	1.3832	1.8454	2.3077
Rate/Square	7.88	11.79	15.73	19.67

**29 Pica                      6 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.5940	2.3849	3.1820	3.9790
7.5	1.4877	2.2260	2.9698	3.7137
8	1.3948	2.0868	2.7842	3.4816
9	1.2398	1.8550	2.4749	3.0947
10	1.1158	1.6695	2.2274	2.7853
12	0.9298	1.3912	1.8561	2.3211
Rate/Square	7.88	11.79	15.73	19.67

**29 Pica                      7 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.5983	2.3914	3.1906	3.9898
7.5	1.4918	2.2320	2.9779	3.7238
8	1.3985	2.0925	2.7918	3.4910
9	1.2431	1.8600	2.4816	3.1031
10	1.1188	1.6740	2.2334	2.7928
12	0.9324	1.3950	1.8612	2.3274
Rate/Square	7.88	11.79	15.73	19.67

**29 Pica                      8 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6032	2.3987	3.2003	4.0019
7.5	1.4963	2.2388	2.9869	3.7351
8	1.4028	2.0989	2.8003	3.5017
9	1.2469	1.8656	2.4891	3.1126
10	1.1222	1.6791	2.2402	2.8013
12	0.9352	1.3992	1.8668	2.3344
Rate/Square	7.88	11.79	15.73	19.67

**30 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6210	2.4254	3.2359	4.0464
7.5	1.5130	2.2637	3.0202	3.7766
8	1.4184	2.1222	2.8314	3.5406
9	1.2608	1.8864	2.5168	3.1472
10	1.1347	1.6978	2.2651	2.8325
12	0.9456	1.4148	1.8876	2.3604
Rate/Square	7.88	11.79	15.73	19.67

**30 Pica                      1 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6254	2.4318	3.2445	4.0572
7.5	1.5170	2.2697	3.0282	3.7867
8	1.4222	2.1279	2.8390	3.5500
9	1.2642	1.8914	2.5235	3.1556
10	1.1377	1.7023	2.2712	2.8400
12	0.9481	1.4186	1.8926	2.3667
Rate/Square	7.88	11.79	15.73	19.67

**30 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6345	2.4456	3.2629	4.0801
7.5	1.5256	2.2825	3.0453	3.8081
8	1.4302	2.1399	2.8550	3.5701
9	1.2713	1.9021	2.5378	3.1734
10	1.1442	1.7119	2.2840	2.8561
12	0.9535	1.4266	1.9033	2.3801
Rate/Square	7.88	11.79	15.73	19.67

**30 Pica                      9 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6616	2.4860	3.3168	4.1476
7.5	1.5508	2.3203	3.0957	3.8711
8	1.4539	2.1753	2.9022	3.6291
9	1.2923	1.9336	2.5797	3.2259
10	1.1631	1.7402	2.3217	2.9033
12	0.9692	1.4502	1.9348	2.4194
Rate/Square	7.88	11.79	15.73	19.67

**30 Pica                      10 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6659	2.4925	3.3254	4.1584
7.5	1.5548	2.3263	3.1037	3.8811
8	1.4576	2.1809	2.9097	3.6386
9	1.2957	1.9386	2.5864	3.2343
10	1.1661	1.7447	2.3278	2.9108
12	0.9718	1.4539	1.9398	2.4257
Rate/Square	7.88	11.79	15.73	19.67

**31 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6751	2.5062	3.3437	4.1813
7.5	1.5634	2.3391	3.1208	3.9025
8	1.4657	2.1929	2.9258	3.6586
9	1.3028	1.9493	2.6007	3.2521
10	1.1725	1.7544	2.3406	2.9269
12	0.9771	1.4620	1.9505	2.4391
Rate/Square	7.88	11.79	15.73	19.67

**31 Pica                      2 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6842	2.5200	3.3621	4.2042
7.5	1.5720	2.3520	3.1379	3.9239
8	1.4737	2.2050	2.9418	3.6787
9	1.3100	1.9600	2.6150	3.2699
10	1.1790	1.7640	2.3535	2.9429
12	0.9825	1.4700	1.9612	2.4525
Rate/Square	7.88	11.79	15.73	19.67

**31 Pica                      3 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.6886	2.5264	3.3707	4.2150
7.5	1.5760	2.3580	3.1460	3.9340
8	1.4775	2.2106	2.9494	3.6881
9	1.3133	1.9650	2.6217	3.2783
10	1.1820	1.7685	2.3595	2.9505
12	0.9850	1.4738	1.9663	2.4588
Rate/Square	7.88	11.79	15.73	19.67

**33 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.7831	2.6679	3.5595	4.4510
7.5	1.6643	2.4900	3.3222	4.1543
8	1.5602	2.3344	3.1145	3.8947
9	1.3869	2.0750	2.7685	3.4619
10	1.2482	1.8675	2.4916	3.1157
12	1.0402	1.5563	2.0764	2.5964
Rate/Square	7.88	11.79	15.73	19.67

**34 Pica                      1 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.8415	2.7552	3.6760	4.5967
7.5	1.7187	2.5715	3.4309	4.2903
8	1.6113	2.4108	3.2165	4.0221
9	1.4323	2.1430	2.8591	3.5752
10	1.2890	1.9287	2.5732	3.2177
12	1.0742	1.6072	2.1443	2.6814
Rate/Square	7.88	11.79	15.73	19.67

**35 Pica                      0 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.8912	2.8296	3.7752	4.7208
7.5	1.7651	2.6410	3.5235	4.4061
8	1.6548	2.4759	3.3033	4.1307
9	1.4709	2.2008	2.9363	3.6717
10	1.3238	1.9807	2.6426	3.3046
12	1.1032	1.6506	2.2022	2.7538
Rate/Square	7.88	11.79	15.73	19.67

**35 Pica                      8 Point Column**

Type Size	Number of Insertions			
	1	2	3	4
7	1.9274	2.8838	3.8475	4.8112
7.5	1.7989	2.6915	3.5910	4.4904
8	1.6865	2.5233	3.3665	4.2098
9	1.4991	2.2429	2.9925	3.7420
10	1.3492	2.0186	2.6932	3.3678
12	1.1243	1.6822	2.2444	2.8065
Rate/Square	7.88	11.79	15.73	19.67

39 Pica	0 Point Column			
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Type Size	Number of Insertions			
	1	2	3	4
7	2.1073	3.1530	4.2067	5.2603
7.5	1.9668	2.9428	3.9262	4.9096
8	1.8439	2.7589	3.6808	4.6028
9	1.6390	2.4523	3.2718	4.0914
10	1.4751	2.2071	2.9447	3.6822
12	1.2293	1.8392	2.4539	3.0685
Rate/Square	7.88	11.79	15.73	19.67

39 Pica	5 Point Column			
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Type Size	Number of Insertions			
	1	2	3	4
7	2.1300	3.1869	4.2520	5.3170
7.5	1.9880	2.9745	3.9685	4.9625
8	1.8638	2.7886	3.7205	4.6523
9	1.6567	2.4787	3.3071	4.1354
10	1.4910	2.2309	2.9764	3.7219
12	1.2425	1.8590	2.4803	3.1016
Rate/Square	7.88	11.79	15.73	19.67