TOWNSHIP BULLETIN

AND UNIFORM COMPLIANCE GUIDELINES
ISSUED BY STATE BOARD OF ACCOUNTS

Volume 307   **November 2014**

<u>ITEMS TO REMEMBER</u>

<u>December</u>

1   On or before June 1 and December 1 of each year (or more frequently if the county legislative body adopts an ordinance requiring additional certifications), the Trustee shall certify the name and address of each person who has money due the person from the township to the County Treasurer. (IC 6-1.1-22-14(a))

17   State Board of Accounts called meeting for individuals elected as Township Trustee for their first term. (IC 5-11-14-1)

25   Legal Holiday – Christmas Day. (IC 1-1-9-1)

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

<u>January</u>

1   Legal Holiday – New Year's Day. (IC 1-1-9-1)

Set up the Financial and Appropriation Record for the year 2015, by bringing forward the fund (cash) balances at the close of the year 2014 and entering appropriations as finally adopted and approved for the year 2015.

15   The township board shall meet on the first Tuesday after the first Monday in January to elect one member as chairman and one member as secretary for the year.
(IC 36-6-6-7(a))

6-31   After the first Monday and on or before the last day of January, members of the township board are to meet annually to organize as a township board of finance by electing one member as president and one member as secretary, each for a period of one year. During the meeting the investment officer shall make a written report to the investing officer's local board of finance summarizing the township's investments during the previous calendar year. The report must contain the name of each financial institution, government agency or instrumentality, or other person with whom the township invested money during the previous calendar year. The township board of finance shall do the following at the meeting:
        (1) Review the report.
        (2) Review the overall investment policy of the township.
(IC 5-13-7-6, IC 5-13-7-7)

19   Legal Holiday – Martin Luther King, Jr.'s Birthday. (IC 1-1-9-1)

31   Last day to provide each employee with a W-2.

Last day to file Employer's Quarterly Federal Tax Return (Form 941) with the Internal Revenue Service for federal and social security taxes for the fourth quarter of 2014.

ITEMS TO REMEMBER
(Continued)

<u>January</u>

31   Last day to file quarterly reports with the Indiana Department of Workforce Development for the quarter ending December 31, 2014.

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

            Last day to prepare, make, and sign a certified report, correctly and completely showing the names and business addresses of each and all officers, employees, and agents in the township, and the respective duties and compensation of each, and file in the office of the state examiner of the state board of accounts. The report must also indicate whether the township offers a health plan, a pension, and other benefits to fulltime and part-time employees. The certification must be filed electronically via Gateway in the manner prescribed under IC 5-14-3.8-7. (IC 5-11-13-1(a))

<u>February</u>

12   Legal Holiday – Abraham Lincoln's Birthday. (IC 1-1-9-1)

16   Legal Holiday – George Washington's Birthday. (IC 1-1-9-1)

17   Last day for the meeting of the township board to consider and approve, in whole or in part, the annual report of the trustee presented under IC 36-6-4-12. (on or before the third Tuesday after the first Monday in February) (IC 36-6-6-9(a))

27   Last day for the trustee to file a copy of the annual report, as approved by the township board, together with the 2014 vouchers, in the county auditor's office (within ten (10) days after the meeting of the township board). (IC 36-6-4-12(d))

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

<u>March</u>

1   Last day to prepare, verify, and file the 2014 Annual Report with the State Board of Accounts (not later than sixty (60) days after the close of each fiscal year). The report must be in the form and content prescribed by the state examiner and filed electronically via Gateway in the manner prescribed under IC 5-14-3.8-7. (IC 5-11-1-4(a))

17   Within four (4) weeks after the third Tuesday following the first Monday in February, the trustee shall publish the abstract prescribed by IC 36-6-4-13(a) in accordance with IC 5-3-1. The abstract must state that a complete and detailed annual report and the accompanying vouchers showing the names of persons paid money by the township have been filed with the county auditor, and that the chairman of the township legislative body has a copy of the report that is available for inspection by any taxpayer of the township.(IC 36-6-4-13(b))

TOWNSHIP BULLETIN
and Uniform Compliance Guidelines

STATE BOARD OF ACCOUNTS CALLED MEETING

Once again, the State Board of Accounts anticipates (in accordance with IC 5-11-14-1) calling a meeting of all individuals that were elected Township Trustee to their first term in office on November 4th. Many items pertaining to understanding requirements of running a township will be discussed at our meeting on Wednesday, December 17, 2014. We have made for arrangements of the meeting location at the Performing Arts Center of MSD Pike Township Schools. The address of the building is 6701 Zionsville Road, Indianapolis, IN. We have scheduled for registration to begin at 8:30 a.m. and it will conclude by 12:00 p.m.

QUALIFYING FOR OFFICE - OATH

IC 5-4-1-1 states in part (a) ". . . every officer and every deputy, before entering on the officer's or deputy's official duties, shall take an oath to support the Constitution of the United States and the Constitution of the State of Indiana, and that the officer or deputy will faithfully discharge the duties of such office."

QUALIFYING FOR OFFICE – OFFICIAL BONDS

OBTAIN BOND FIRST

IC 5-4-1-9 states "An officer required to give an official bond shall give the bond before the commencement of his term of office. If the officer fails to give the bond before that time, the officer may not take office."

COUNTY AUDITOR APPROVAL

IC 5-4-1-8 states in part "The official bonds of officers, if sufficient, shall be approved as follows …township trustee . . . by the county auditor."

PAYABLE TO STATE

IC 5-4-1-10 states "All official bonds shall be payable to the state of Indiana; and every such bond shall be obligatory to such state, upon the principal and sureties, for the faithful discharge of all duties required of such officer by any law, then or subsequently in force, for the use of any person injured by any breach of the condition thereof."

AMOUNT OF BOND

IC 5-4-1-18 states in part "(c) Except as provided in subsections (h) and (i), the fiscal bodies of the respective units shall fix the amount of the bond of . . . township trustees . . . as follows: (1) The amount of annual coverage must equal thirty thousand dollars ($30,000) for each one million dollars ($1,000,000) of receipts of the officer's office during the last complete fiscal year before the purchase of the bond, subject to subdivision (2). (2) The amount of annual coverage may not be less than thirty thousand dollars ($30,000) nor more than three hundred thousand dollars ($300,000) unless the fiscal body approves a greater amount of annual coverage for the officer or employee. . ."

FILE BOND

IC 5-4-1-5.1(b) states in part: "Every elected or appointed officer, official, deputy, or employee of a political subdivision who is required by section 18 of this chapter to file an official bond for the faithful performance of duty . . . shall file the bond in the office of the county recorder in the county residence of the officer, official, deputy or employee."

QUALIFYING FOR OFFICE – OFFICIAL BONDS
(Continued)

COST OF BOND

     The cost on the trustee's bond is payable from the township (General) fund. [IC 5-4-5-2]

OTHER BOND SITUATIONS

     We have noted situations where various employees (other than bonded trustees and deputy trustees) are involved in handling cash and cash related transactions (i.e., township community centers, parks, etc.) without the township being afforded bond coverage.

     We strongly recommend and encourage township officials to immediately obtain bond coverage for all employees that might be handling cash and related transactions. Township officials should also give consideration to providing crime insurance coverage.

     Whenever deemed necessary by the trustee and township board to bond any employees not required by a specific statute to be bonded otherwise, such employees may be bonded by either individual or blanket bonds conditioned upon faithful performance of duties and in amounts and with surety approved by the township board by adopting a resolution in accordance with IC 36-1-3-1 et seq.

     The State Board of Accounts is of the audit position continuation certificates or renewals should not be used in lieu of obtaining the required annual bond coverage.

     No charge shall be made by the recorder of the county for recording the official bonds of any public officer, deputy, appointee or employee. [IC 36-2-7-10(g)(1)]

     When a minimum premium is required for official bonds, the township should make certain maximum coverage is provided for the required minimum premium.

DESIGNATION OF TRUSTEE

     We have received inquiries concerning designating an acting Trustee under certain circumstances.

     IC 36-6-4-18 states in part "(a) Within thirty (30) days after taking office, the executive shall designate a person who shall perform the executive's duties whenever the executive is incapable of performing the executive's functions because the executive: (1) is absent from the township; or (2) becomes incapacitated. The executive shall give notice of the designation to the chairman of the township legislative body, the county sheriff, and any other persons that the executive chooses. The designee shall have all the powers of the executive. The executive is responsible for all acts of the designee. The executive may change the designee under this section at any time. (b) The designee shall perform the executive's duties until: (1) the executive is no longer absent from the township; or (2) an acting executive is appointed by the county executive under section 16 of this chapter."

DESIGNATION OF TRUSTEE
(Continued)

We have not received any Official Opinions of the Attorney General of the State of Indiana which would indicate that a trustee could appoint a current township board member to serve as acting trustee in a township. Potential constitutional conflicts could exist concerning the holding of two (2) lucrative offices. However, Official Opinion Number 87-22 issued November 18, 1987, of the Attorney General of the State of Indiana discussed the possibility of designating another trustee and provides: "It is, therefore, my Official Opinion that a township trustee may appoint or designate pursuant to Public Law 105-1986 (HEA 1374), a township trustee of another township to act for him while he is absent from the township or while he is incapacitated. However, if any compensation is paid to the designee for the performance of the duties of the appointing township trustee, there may be a violation of Article 2, § 9 of the Constitution of Indiana." Therefore, we are of the audit position townships should consider appointing someone who is a resident of the township not currently holding another lucrative office. Examples might be the previous township trustee, previous board members, or a current clerk in the office. Finally, we are not aware of any provision for payment of compensation to an individual designated in accordance with IC 36-6-4-18.

TRANSITION FROM PRIOR TRUSTEE TO NEWLY ELECTED TRUSTEE

Township business is a continuing one; a change of office need not interrupt that business.

IC 36-6-4-14, concerning trustees who do not succeed themselves in office, states "When his term of office expires, the executive shall: (1) immediately deliver to the new executive custody of all funds and property of the township, except records necessary in the preparation of his annual report; (2) deliver to the new executive, not later than the second Monday in the next January, his annual report and any records he has retained; and (3) attend the annual meeting of the township legislative body held under IC 36-6-6-9 and submit to inquiries from the legislative body concerning the operation of the executive's office during the preceding calendar year."

Therefore, the State Board of Accounts is of the audit position the trustee in office on December 31, 2014, is required to turn over to the new trustee all books, township bulletins, the township manual, and the records of the township.

Our opinion is that the annual report required by IC 36-6-4-12 and the annual report required to be submitted via the Gateway per IC 5-11-1-4 are not necessarily the same report. In order to not duplicate efforts, we have designed the Gateway Annual Report system to be able to provide outputs that will satisfy the requirements of IC 36-6-4-12 and IC 36-6-4-13. We believe that it is the outgoing Trustee's responsibility to provide the information required to be inputted into the Gateway Annual Report, but it is the incoming Trustee's responsibility to input the information and submit the report prior to March 1, 2015 (within 60 days of the end of the fiscal period).

The bank accounts should be in the name of the township, for example, "Clay Township, St. Joseph County", not in the name of the trustee. Therefore, if the account is properly in the name of the township, the change can be made at the bank by simply registering the authorized signature of the incoming trustee.

We suggest the outgoing trustee prepare in duplicate an itemized inventory of equipment and other assets owned by the township on December 31, to be signed by the successor and outgoing trustee. One copy is for the outgoing trustee and one copy is to be kept by the incoming trustee as a township record.

TRANSITION FROM PRIOR TRUSTEE TO NEWLY ELECTED TRUSTEE
(Continued)

Sometimes difficulty exists for a person in office to convey to their successor all of the knowledge gained during a term or terms of office. However, you may be able to give valuable assistance and you are urged to provide information to your successor.

EXAMINATION OF TRUSTEE'S OFFICE

Several trustees have requested an examination of their office at the close of office on December 31, 2014. An examination is not necessarily required for the township trustee going out of office on December 31, 2014. Properly maintained and retained records in accordance with the Public Records Law should provide a clear examination trail. Contact our Office at (317) 232-2512 if problems exist with records prior to the regular examination and we will try to assist in resolving the situation.

STATE BOARD OF ACCOUNTS YEAR END REPORTING

Report of Names, Addresses, Duties and Compensation of Public Employees (Annual Personnel Report - Form 100R)

Every township shall during the month of January of each year prepare, make, and sign a certified report, correctly and completely showing the names and business addresses of each and all officers, employees, and agents in their respective offices, and the respective duties and compensation of each with the state board of accounts.

The report must indicate whether the township offers a health plan, a pension, and other benefits to fulltime and part-time employees. The report must be filed electronically through the State Gateway.

The department of local government finance may not approve the budget of a township or a supplemental appropriation for a township until the township files the report for the preceding calendar year. (5-11-13-1)

A report that is submitted after December 31, 2012, must include a statement by the trustee regarding whether the township has implemented a policy under IC 36-1-20.2 (nepotism) and IC 36-1-21 (contracting). If a township does not implement a nepotism and a contracting policy, the department of local government finance may not approve the unit's budget or any additional appropriations for the township for the ensuing calendar year. For the report due January 2015, each Township will be required to upload their policies if they indicate they have passed them.

This report is a public record which shall be open to public inspection and examination. A trustee who fails to file this report commits a Class C infraction and is subject to removal for neglect of duty. (IC 5-11-13-2) (IC 5-11-13-3)

The total compensation paid to all employees of the township for the previous year should be reported. This includes part time, temporary, and seasonal employees. If a W2 was required to be issued, that person should be listed on the report. IRS Publication 15 has guidelines for determining if someone is an employee or a contractor. Elected officials, including board members, should be included.

STATE BOARD OF ACCOUNTS YEAR END REPORTING
(Continued)

The trustee must print and sign an Attestation Statement that certifies that the data is accurate to the best of their knowledge and belief. This must be mailed to our office within five days of submitting your report via Gateway. If you resubmit your report, you must print, sign and mail a new attestation form.

Correspondence regarding the report will be sent to the email address on file in the State Gateway. If there has been a change in trustee or email address please send an email to annualreport@sboa.in.gov requesting an update of the township's contact information.

Annual Financial Report

The state examiner shall require from every local governmental unit a financial report covering the full period of each fiscal year. These reports shall be prepared, verified, and filed with the state examiner not later than sixty (60) days after the close of each fiscal year. The reports must be in the form and content prescribed by the state examiner and filed electronically in the State Gateway.

The department of local government finance may not approve the budget of a township or a supplemental appropriation for a township until the township files an annual report for the preceding calendar year. (IC 5-11-1-4)

A trustee who fails to file this report commits a Class B infraction and forfeits office. (IC 5-11-1-10)

Beginning in 2013, IC 5-11-20 required that governmental entities include pension information on their employee retirement plans as part of the Annual Financial Report. If your township offers only the Public Employees Retirement Fund (PERF) pension you will not need to provide any additional information on the Annual Financial Report. If your township has any other pension plans where the township makes contributions to the plan or funds any part of the benefits, you will need to provide additional information on the Annual Financial Report.

The trustee must print and sign an Attestation Statement that certifies that the data is accurate to the best of their knowledge and belief. This must be mailed to our office within five days of submitting your report via Gateway. If you resubmit your report, you must print, sign and mail a new attestation form.

Correspondence regarding the report will be sent to the email address on file in the State Gateway. If there has been a change in trustee or email address please send an email to annualreport@sboa.in.gov requesting an update of the township's contact information.

REPORTING OF ALL FUNDS ON THE ANNUAL REPORT

The township trustee shall present a complete report of all receipts and expenditures of the preceding calendar year, including the balance to the credit of each fund controlled by the trustee. If the trustee controls any money that is not included in a particular fund, then the trustee shall state all the facts concerning that money in the report.

Some funds that are often left off the Annual Financial Report are Payroll Withholding funds, Representative Payee funds, and Small Claims Court funds.

TRAVEL EXPENSE

IC 36-6-8-3(b) states in part: "The township executive is entitled to a sum for mileage in the performance of official duties equal to the sum per mile paid to state officers and employees. However, this subsection does not apply when the township executive uses a township vehicle in the performance of official duties."

The current mileage rate for the State of Indiana is $.44 per mile.

IC 36-6-6-12(b) states: "Each representative of the township attending any meeting, conference, seminar, or convention approved by the township trustee shall be allowed reimbursement for all necessary and legitimate expenses incurred while representing the township. Expenses shall be paid to each representative in accordance with the township's reimbursement policy, which may include an established per diem rate, as recommended by the township trustee and adopted by the township legislative body."

A township trustee and township board should determine whether parking fees and toll charges are included in the rate or, on the other hand, whether such expenses are to be reimbursed separately based on the submission of receipts.

Reimbursed mileage should not include travel to and from the officer's or employee's home and regular place of employment. If more than one person rides in the same vehicle, only one mileage reimbursement is allowable. General Form 101 (or an approved substitute) should be used for claiming mileage. The odometer reading columns on this form are to be used only when the distance between points cannot be determined by fixed mileage or official highway maps.

When traveling outside the local unit's boundaries on official business, officers and employees may also be reimbursed for meals, lodging, and incidental expenses as defined in the travel policy. The claim for reimbursement should be supported by itemized receipts from hotels, restaurants, and taxi cabs used by the officer or employee while traveling on official business.

If a fixed per diem rate is established by policy, the policy should clearly indicate which type of expenses, in addition to meals, are included in the rate and which expenses are to be reimbursed on the basis of actual receipts being submitted by the officer or employee. The policy should also define the local unit's boundaries for purposes of reimbursing travel; i.e., outside a 50-mile radius of the office, outside of the county, etc. The policy should cover a proportionate reduction in the per diem rate when meals are provided by an outside party.

When State statutes govern the amounts of allowable travel reimbursements, those statutes supersede local policy.

RATES FOR LEGAL ADVERTISING
Effective January 1, 2015

The following rates, effective January 1, 2015, were computed based upon the statutorily authorized 2.75% increase allowed by IC 5-3-1-1(b)(3). Any percentage increase other than the 2.75% will require a separate computation by the State Board of Accounts. After December 31, 2009 a 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.

5 Pica 8 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2469	0.3686	0.4922	0.6151
7.5	0.2304	0.3440	0.4594	0.5741
8	0.2160	0.3225	0.4307	0.5382
9	0.1920	0.2867	0.3828	0.4784
10	0.1728	0.2580	0.3446	0.4306
12	0.1440	0.2150	0.2871	0.3588
Rate/Square	6.35	9.48	12.66	15.82

5 Pica 10 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2539	0.3790	0.5061	0.6324
7.5	0.2369	0.3537	0.4724	0.5903
8	0.2221	0.3316	0.4428	0.5534
9	0.1974	0.2948	0.3936	0.4919
10	0.1777	0.2653	0.3543	0.4427
12	0.1481	0.2211	0.2952	0.3689
Rate/Square	6.35	9.48	12.66	15.82

6 Pica 3 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2721	0.4063	0.5426	0.6780
7.5	0.2540	0.3792	0.5064	0.6328
8	0.2381	0.3555	0.4748	0.5933
9	0.2117	0.3160	0.4220	0.5273
10	0.1905	0.2844	0.3798	0.4746
12	0.1588	0.2370	0.3165	0.3955
Rate/Square	6.35	9.48	12.66	15.82

6 Pica 4 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2756	0.4115	0.5495	0.6867
7.5	0.2573	0.3841	0.5129	0.6409
8	0.2412	0.3601	0.4808	0.6008
9	0.2144	0.3200	0.4274	0.5341
10	0.1929	0.2880	0.3847	0.4807
12	0.1608	0.2400	0.3206	0.4006
Rate/Square	6.35	9.48	12.66	15.82

6 Pica 6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2830	0.4225	0.5643	0.7051
7.5	0.2642	0.3944	0.5267	0.6581
8	0.2477	0.3697	0.4937	0.6170
9	0.2201	0.3286	0.4389	0.5484
10	0.1981	0.2958	0.3950	0.4936
12	0.1651	0.2465	0.3292	0.4113
Rate/Square	6.35	9.48	12.66	15.82

6 Pica 7 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2865	0.4277	0.5712	0.7138
7.5	0.2674	0.3992	0.5331	0.6662
8	0.2507	0.3743	0.4998	0.6246
9	0.2228	0.3327	0.4443	0.5552
10	0.2006	0.2994	0.3999	0.4997
12	0.1671	0.2495	0.3332	0.4164
Rate/Square	6.35	9.48	12.66	15.82

6 Pica 9 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.2939	0.4388	0.5860	0.7322
7.5	0.2743	0.4095	0.5469	0.6834
8	0.2572	0.3839	0.5127	0.6407
9	0.2286	0.3413	0.4558	0.5695
10	0.2057	0.3072	0.4102	0.5126
12	0.1715	0.2560	0.3418	0.4271
Rate/Square	6.35	9.48	12.66	15.82

7 Pica Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.3048	0.4550	0.6077	0.7594
7.5	0.2845	0.4247	0.5672	0.7087
8	0.2667	0.3982	0.5317	0.6644
9	0.2371	0.3539	0.4726	0.5906
10	0.2134	0.3185	0.4254	0.5316
12	0.1778	0.2654	0.3545	0.4430
Rate/Square	6.35	9.48	12.66	15.82

7 Pica 1 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.3083	0.4602	0.6146	0.7680
7.5	0.2877	0.4296	0.5736	0.7168
8	0.2697	0.4027	0.5378	0.6720
9	0.2398	0.3580	0.4780	0.5974
10	0.2158	0.3222	0.4302	0.5376
12	0.1798	0.2685	0.3585	0.4480
Rate/Square	6.35	9.48	12.66	15.82

7 Pica 3 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.3157	0.4713	0.6294	0.7865
7.5	0.2946	0.4399	0.5874	0.7340
8	0.2762	0.4124	0.5507	0.6882
9	0.2455	0.3666	0.4895	0.6117
10	0.2210	0.3299	0.4406	0.5505
12	0.1842	0.2749	0.3671	0.4588
Rate/Square	6.35	9.48	12.66	15.82

7 Pica 6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.3266	0.4875	0.6511	0.8136
7.5	0.3048	0.4550	0.6077	0.7594
8	0.2858	0.4266	0.5697	0.7119
9	0.2540	0.3792	0.5064	0.6328
10	0.2286	0.3413	0.4558	0.5695
12	0.1905	0.2844	0.3798	0.4746
Rate/Square	6.35	9.48	12.66	15.82

9 Pica Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.3919	0.5851	0.7813	0.9763
7.5	0.3658	0.5460	0.7292	0.9112
8	0.3429	0.5119	0.6836	0.8543
9	0.3048	0.4550	0.6077	0.7594
10	0.2743	0.4095	0.5469	0.6834
12	0.2286	0.3413	0.4558	0.5695
Rate/Square	6.35	9.48	12.66	15.82

9 Pica 4 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4063	0.6065	0.8100	1.0121
7.5	0.3792	0.5661	0.7560	0.9446
8	0.3555	0.5307	0.7087	0.8856
9	0.3160	0.4717	0.6300	0.7872
10	0.2844	0.4246	0.5670	0.7085
12	0.2370	0.3538	0.4725	0.5904
Rate/Square	6.35	9.48	12.66	15.82

9 Pica 5 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4102	0.6124	0.8178	1.0219
7.5	0.3828	0.5715	0.7632	0.9538
8	0.3589	0.5358	0.7155	0.8941
9	0.3190	0.4763	0.6360	0.7948
10	0.2871	0.4286	0.5724	0.7153
12	0.2393	0.3572	0.4770	0.5961
Rate/Square	6.35	9.48	12.66	15.82

9 Pica 6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4137	0.6176	0.8247	1.0306
7.5	0.3861	0.5764	0.7697	0.9619
8	0.3620	0.5404	0.7216	0.9017
9	0.3217	0.4803	0.6414	0.8015
10	0.2896	0.4323	0.5773	0.7214
12	0.2413	0.3602	0.4811	0.6012
Rate/Square	6.35	9.48	12.66	15.82

9 Pica 9 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4245	0.6338	0.8464	1.0577
7.5	0.3962	0.5916	0.7900	0.9872
8	0.3715	0.5546	0.7406	0.9255
9	0.3302	0.4930	0.6583	0.8226
10	0.2972	0.4437	0.5925	0.7404
12	0.2477	0.3697	0.4937	0.6170
Rate/Square	6.35	9.48	12.66	15.82

9 Pica 10 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4280	0.6390	0.8534	1.0664
7.5	0.3995	0.5964	0.7965	0.9953
8	0.3745	0.5591	0.7467	0.9331
9	0.3329	0.4970	0.6637	0.8294
10	0.2996	0.4473	0.5973	0.7465
12	0.2497	0.3728	0.4978	0.6220
Rate/Square	6.35	9.48	12.66	15.82

10 Pica Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4354	0.6501	0.8681	1.0848
7.5	0.4064	0.6067	0.8102	1.0125
8	0.3810	0.5688	0.7596	0.9492
9	0.3387	0.5056	0.6752	0.8437
10	0.3048	0.4550	0.6077	0.7594
12	0.2540	0.3792	0.5064	0.6328
Rate/Square	6.35	9.48	12.66	15.82

10 Pica 1 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4389	0.6553	0.8751	1.0935
7.5	0.4097	0.6116	0.8167	1.0206
8	0.3840	0.5734	0.7657	0.9568
9	0.3414	0.5096	0.6806	0.8505
10	0.3072	0.4587	0.6125	0.7654
12	0.2560	0.3822	0.5105	0.6379
Rate/Square	6.35	9.48	12.66	15.82

10 Pica 6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4572	0.6826	0.9115	1.1390
7.5	0.4267	0.6371	0.8508	1.0631
8	0.4001	0.5972	0.7976	0.9967
9	0.3556	0.5309	0.7090	0.8859
10	0.3200	0.4778	0.6381	0.7973
12	0.2667	0.3982	0.5317	0.6644
Rate/Square	6.35	9.48	12.66	15.82

10 Pica 11 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4755	0.7099	0.9480	1.1846
7.5	0.4438	0.6625	0.8848	1.1056
8	0.4161	0.6211	0.8295	1.0365
9	0.3698	0.5521	0.7373	0.9214
10	0.3328	0.4969	0.6636	0.8292
12	0.2774	0.4141	0.5530	0.6910
Rate/Square	6.35	9.48	12.66	15.82

11 Pica Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4790	0.7151	0.9549	1.1933
7.5	0.4470	0.6674	0.8913	1.1137
8	0.4191	0.6257	0.8356	1.0441
9	0.3725	0.5562	0.7427	0.9281
10	0.3353	0.5005	0.6684	0.8353
12	0.2794	0.4171	0.5570	0.6961
Rate/Square	6.35	9.48	12.66	15.82

11 Pica 3 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.4899	0.7313	0.9766	1.2204
7.5	0.4572	0.6826	0.9115	1.1390
8	0.4286	0.6399	0.8546	1.0679
9	0.3810	0.5688	0.7596	0.9492
10	0.3429	0.5119	0.6836	0.8543
12	0.2858	0.4266	0.5697	0.7119
Rate/Square	6.35	9.48	12.66	15.82

11 Pica 8 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5081	0.7586	1.0131	1.2660
7.5	0.4743	0.7080	0.9456	1.1816
8	0.4446	0.6638	0.8865	1.1077
9	0.3952	0.5900	0.7880	0.9846
10	0.3557	0.5310	0.7092	0.8862
12	0.2964	0.4425	0.5910	0.7385
Rate/Square	6.35	9.48	12.66	15.82

12 Pica 5 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5408	0.8074	1.0782	1.3473
7.5	0.5047	0.7535	1.0063	1.2575
8	0.4732	0.7064	0.9434	1.1789
9	0.4206	0.6280	0.8386	1.0479
10	0.3786	0.5652	0.7547	0.9431
12	0.3155	0.4710	0.6289	0.7859
Rate/Square	6.35	9.48	12.66	15.82

13 Pica 2 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5735	0.8561	1.1433	1.4287
7.5	0.5352	0.7991	1.0671	1.3334
8	0.5018	0.7491	1.0004	1.2501
9	0.4460	0.6659	0.8892	1.1112
10	0.4014	0.5993	0.8003	1.0001
12	0.3345	0.4994	0.6669	0.8334
Rate/Square	6.35	9.48	12.66	15.82

13 Pica 6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5878	0.8776	1.1720	1.4645
7.5	0.5486	0.8191	1.0938	1.3668
8	0.5144	0.7679	1.0255	1.2814
9	0.4572	0.6826	0.9115	1.1390
10	0.4115	0.6143	0.8204	1.0251
12	0.3429	0.5119	0.6836	0.8543
Rate/Square	6.35	9.48	12.66	15.82

13 Pica 7 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.5913	0.8828	1.1789	1.4732
7.5	0.5519	0.8239	1.1003	1.3749
8	0.5174	0.7724	1.0315	1.2890
9	0.4599	0.6866	0.9169	1.1458
10	0.4139	0.6179	0.8252	1.0312
12	0.3449	0.5150	0.6877	0.8593
Rate/Square	6.35	9.48	12.66	15.82

14 Pica 1 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.6131	0.9153	1.2223	1.5274
7.5	0.5722	0.8543	1.1408	1.4256
8	0.5364	0.8009	1.0695	1.3365
9	0.4768	0.7119	0.9507	1.1880
10	0.4292	0.6407	0.8556	1.0692
12	0.3576	0.5339	0.7130	0.8910
Rate/Square	6.35	9.48	12.66	15.82

14 Pica 7 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.6349	0.9478	1.2657	1.5816
7.5	0.5925	0.8846	1.1813	1.4762
8	0.5555	0.8293	1.1075	1.3839
9	0.4938	0.7372	0.9844	1.2302
10	0.4444	0.6634	0.8860	1.1071
12	0.3703	0.5529	0.7383	0.9226
Rate/Square	6.35	9.48	12.66	15.82

15 Pica 4 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.6675	0.9965	1.3308	1.6630
7.5	0.6230	0.9301	1.2421	1.5521
8	0.5841	0.8720	1.1645	1.4551
9	0.5192	0.7751	1.0351	1.2934
10	0.4673	0.6976	0.9316	1.1641
12	0.3894	0.5813	0.7763	0.9701
Rate/Square	6.35	9.48	12.66	15.82

17 Pica 8 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.7694	1.1487	1.5340	1.9168
7.5	0.7181	1.0721	1.4317	1.7891
8	0.6732	1.0051	1.3422	1.6772
9	0.5984	0.8934	1.1931	1.4909
10	0.5386	0.8041	1.0738	1.3418
12	0.4488	0.6700	0.8948	1.1182
Rate/Square	6.35	9.48	12.66	15.82

20 Pica 4 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.8852	1.3216	1.7649	2.2054
7.5	0.8262	1.2335	1.6472	2.0584
8	0.7746	1.1564	1.5443	1.9297
9	0.6885	1.0279	1.3727	1.7153
10	0.6197	0.9251	1.2354	1.5438
12	0.5164	0.7709	1.0295	1.2865
Rate/Square	6.35	9.48	12.66	15.82

20 Pica 5 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.8891	1.3274	1.7727	2.2152
7.5	0.8299	1.2389	1.6545	2.0675
8	0.7780	1.1615	1.5511	1.9383
9	0.6916	1.0324	1.3788	1.7229
10	0.6224	0.9292	1.2409	1.5506
12	0.5187	0.7743	1.0341	1.2922
Rate/Square	6.35	9.48	12.66	15.82

21 Pica 6 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.9362	1.3976	1.8664	2.3323
7.5	0.8738	1.3044	1.7420	2.1768
8	0.8192	1.2229	1.6331	2.0408
9	0.7281	1.0870	1.4517	1.8140
10	0.6553	0.9783	1.3065	1.6326
12	0.5461	0.8153	1.0888	1.3605
Rate/Square	6.35	9.48	12.66	15.82

22 Pica 9 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	0.9906	1.4789	1.9750	2.4679
7.5	0.9246	1.3803	1.8433	2.3034
8	0.8668	1.2940	1.7281	2.1594
9	0.7705	1.1502	1.5361	1.9195
10	0.6934	1.0352	1.3825	1.7275
12	0.5779	0.8627	1.1521	1.4396
Rate/Square	6.35	9.48	12.66	15.82

30 Pica 10 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	1.3424	2.0041	2.6764	3.3444
7.5	1.2529	1.8705	2.4980	3.1215
8	1.1746	1.7536	2.3418	2.9264
9	1.0441	1.5588	2.0816	2.6012
10	0.9397	1.4029	1.8735	2.3411
12	0.7831	1.1691	1.5612	1.9509
Rate/Square	6.35	9.48	12.66	15.82

31 Pica 1 Point Column

Type Size	Number of Insertions			
	1	2	3	4
7	1.3533	2.0204	2.6981	3.3716
7.5	1.2631	1.8857	2.5182	3.1468
8	1.1841	1.7678	2.3608	2.9501
9	1.0526	1.5714	2.0985	2.6223
10	0.9473	1.4143	1.8887	2.3601
12	0.7894	1.1786	1.5739	1.9667
Rate/Square	6.35	9.48	12.66	15.82