

SPECIAL DISTRICTS BULLETIN

AND UNIFORM COMPLIANCE GUIDELINES
ISSUED BY STATE BOARD OF ACCOUNTS

DECEMBER 2018

PAGE 1

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.

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STATE BOARD OF ACCOUNTS INTERNET ADDRESSES

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MONTHLY AND ANNUAL ENGAGEMENT UPLOADS

In keeping with State Examiner Directive 2018-1, the following files and governmental unit information are required to be uploaded annually:

- Year-end bank statement
- Year-end outstanding check list
- Year-end investment statements
- Detail of receipts for the year
- Detail of disbursements for the year
- Current year salary ordinance
- Annual employee earnings record
- Annual vendor history report

Annual files are due to be uploaded on Gateway no later than March 1, 2019.

SBOA personnel have developed a user guide for the Upload App located at: <https://gateway.ifionline.org/userguides/engagementguide>. If, after consulting the user guide, you still have questions, please contact the helpdesk at gateway@sboa.in.gov.

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 user guide. Contact information for questions and other help, including a "Frequently Asked Questions" section, is also available on the user guide.

More information is available on the SBOA website by clicking the Political Subdivisions link on the left hand menu and then by selecting the appropriate unit type. Then scroll down and select the Gateway section and the Gateway Upload Application link.

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 Board meetings
- Bank reconciliations complete and bank information (statements, etc.)
- Claims in order with supporting documentation available
- Copies of new 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)

FEDERAL AND STATE MILEAGE RATES

The Federal business mileage rate is available at www.irs.gov. The State mileage rate is 38 cents per mile as of the date of this publication.

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 treasurer of each political subdivision shall prepare or cause to be prepared a list in triplicate of all warrants or checks that have been outstanding for a period of two (2) or more years as of December 31 of the preceding year. The original copy of each list shall be filed with the board of finance of a political subdivision. The duplicate copy shall be transmitted to the disbursing officer of the political subdivision. The triplicate copy of each list shall be filed in the office of the treasurer of the political subdivision. If the treasurer serves also as the disbursing officer of the political subdivision, only two (2) copies of each list need be prepared or caused to be prepared by the treasurer.

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.

Upon the preparation and transmission of the copies of the list of the outstanding warrants or checks, the treasurer of the political subdivision shall enter the amounts so listed as a receipt into the fund or funds from which they were originally drawn and shall also remove the warrants or checks from the record of outstanding warrants or checks.

If the fund from which the warrant or check was originally drawn is not in existence, or cannot be ascertained, the amount of the outstanding warrant or check shall be receipted into the general fund of the political subdivision.

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 2019 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 2019, with proper explanation, and added to the 2019 appropriation for the same purpose. By properly carrying out this procedure, the 2019 budget will not be expected to stand any expense not anticipated in making the budget.

We suggest the proper officials of the district 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 district 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 district board 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....

(4) Funds of any other political subdivision, to the general fund or rainy day fund of the political subdivision, as provided in section 5.1 of this chapter. However, if the political subdivision is dissolved or does not have a general fund or rainy day fund, then to the general fund of each of the units located in the political subdivision in the same proportion that the assessed valuation of the unit bears to the total assessed valuation of the political subdivision.”

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

All districts 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 district offers a health plan, a pension, and other benefits to full-time and part-time employees.

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

Fiscal Officers are no longer required to mail a signed hardcopy of the Attestation Statement to the State Board of Accounts. The Attestation Statement submitted electronically with the 100R is sufficient.

Please refer to the User Guide for more information on the filing of this report. Please note the answer to this frequently asked question from the User Guide:

We don't have any paid employees or our employees are paid by another unit. Do we have to submit a 100R?

Yes, ALL units are required to submit a 100R. Although you will not list any employees, you will still need to logon, answer the questions in the 100R that are related to the above situation, and submit.

CERTIFICATION OF NAMES AND ADDRESSES TO COUNTY TREASURER

IC 6-1.1-22-14 states:

“(a) 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 disbursing officer of each political subdivision and the township executive shall certify the name and address of each person who has money due the person from the political subdivision to the treasurer of each county in which the political subdivision is located.

(b) 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 disbursing officer for the state, each state educational institution, and every other governmental entity in Indiana that does not provide the information under subsection (a), shall certify the name and address of each person who is employed by the governmental entity to the county treasurer for the county where the employee works. A governmental entity that has an employee who works in more than one (1) county shall certify the information for the employee to the county where the employee has the employee's principal office.

(c) Upon the receipt of the information under subsection (a) or (b), the county treasurer shall search the treasurer's records to ascertain if any person so certified to the treasurer is delinquent in the payment of property taxes.”

IC 6-1.1-22-15 states: “If the county treasurer finds that a person whose name is certified to him under section 14 of this chapter is delinquent in the payment of his taxes, he shall certify the name of that person and the amount of the delinquency to the official of the political subdivision or other governmental entity 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.”

ANNUAL FINANCIAL REPORT

Indiana Code 5-11-1-4 states:

(a) The state examiner shall require... financial reports 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 manner prescribed under [IC 5-14-3.8-7](#).

(b) The department of local government finance may not approve the budget of a political subdivision or a supplemental appropriation for a political subdivision until the political subdivision files an annual report under subsection (a) for the preceding calendar year.

For more information, please consult the User Guide, which is available at www.in.gov/sboa or on the Gateway website.

Fiscal Officers are no longer required to mail a signed hardcopy of the Attestation Statement of the State Board of Accounts. The Attestation Statement submitted electronically with the AFR is sufficient.

IC 5-3-1-3.5 states:

“(a) This section applies to each political subdivision that has:

- (1) an annual budget of at least three hundred thousand dollars (\$300,000); and
- (2) the power to levy taxes.

(b) This section does not apply to a political subdivision that is required to publish an annual report under any other statute.

(c) As used in this section, "political subdivision" has the meaning set forth in [IC 36-1-2-13](#).

(d) Not later than sixty (60) days after the expiration of each calendar year, a political subdivision shall publish an annual report of the receipts and expenditures of the political subdivision during the preceding calendar year.

(e) The annual reports required by this section shall be published only one (1) time per 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 district, in which case publication in the one newspaper is sufficient. If no newspaper is published in the district, then publication is to be made in a newspaper published in the county in which the district is located and that circulates within the district.

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

TIMELY FILING OF REQUIRED REPORTS**The Certified Report of Names, Addresses, Duties and Compensation of Public Employees (100R) 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 100R) 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 100R 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 100R 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 100R 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. Also, please feel free to contact our Directors of Audit Services if you are having difficulty completing your 100R or AFR. Contact information is available on our website at www.in.gov/sboa.

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.

INSURANCE FRAUD SCHEMES

We have received reports of supposed insurance agents failing to remit insurance premiums to their insurance companies and creating fraudulent insurance policies. Please be aware of the following warning signs:

1. The insurance agent is very aggressive or tries to pressure you into signing a policy immediately quoting significant savings.
2. Rates are much lower than their competitor's comparable coverage (typically 15-20% less).
3. When attempting to contact the insurer for more details, the insurer is unreachable or there is no published phone number for the insurance company.

Before signing an application for an insurance policy or writing a check to an insurance company, we would recommend that units take the time to confirm the legitimacy of the business. The Indiana Department of Insurance (IDOI) can verify whether an insurance company exists and is authorized to sell insurance in Indiana. IDOI's website has additional resources and tips to combat insurance fraud. <https://www.in.gov/idoi/2565.htm>

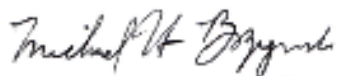
HAPPY HOLIDAYS

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 District officials is truly appreciated.

From each of us and our staff 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.



Paul D. Joyce, CPA
State Examiner



Michael H. Bozyski, CPA
Deputy State Examiner



Tammy R. White, CPA
Deputy State Examiner

RATES FOR LEGAL ADVERTISING

Effective January 1, 2019

The following rates, effective January 1, 2019, 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		4 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.3069	0.4588	0.6125	0.7657
7.5		0.2864	0.4282	0.5716	0.7146
8		0.2685	0.4014	0.5359	0.6700
9		0.2387	0.3568	0.4764	0.5955
10		0.2148	0.3212	0.4287	0.5360
12	<u>EM</u> 6.33	0.1790	0.2676	0.3573	0.4466
Rate/Square		7.07	10.57	14.11	17.64

6 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.3272	0.4892	0.6531	0.8165
7.5		0.3054	0.4566	0.6096	0.7620
8		0.2863	0.4281	0.5715	0.7144
9		0.2545	0.3805	0.5080	0.6350
10		0.2291	0.3425	0.4572	0.5715
12	<u>EM</u> 6.75	0.1909	0.2854	0.3810	0.4763
Rate/Square		7.07	10.57	14.11	17.64

6 Pica		10 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.3311	0.4950	0.6608	0.8262
7.5		0.3090	0.4620	0.6168	0.7711
8		0.2897	0.4332	0.5782	0.7229
9		0.2575	0.3850	0.5140	0.6426
10		0.2318	0.3465	0.4626	0.5783
12	<u>EM</u> 6.83	0.1932	0.2888	0.3855	0.4819
Rate/Square		7.07	10.57	14.11	17.64

7 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.3394	0.5074	0.6773	0.8467
7.5		0.3167	0.4735	0.6321	0.7903
8		0.2969	0.4439	0.5926	0.7409
9		0.2639	0.3946	0.5268	0.6586
10		0.2376	0.3552	0.4741	0.5927
12	<u>EM</u> 7	0.1980	0.2960	0.3951	0.4939
Rate/Square		7.07	10.57	14.11	17.64

7 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.3636	0.5436	0.7257	0.9072
7.5		0.3394	0.5074	0.6773	0.8467
8		0.3182	0.4757	0.6350	0.7938
9		0.2828	0.4228	0.5644	0.7056
10		0.2545	0.3805	0.5080	0.6350
12	<u>EM</u> 7.5	0.2121	0.3171	0.4233	0.5292
Rate/Square		7.07	10.57	14.11	17.64

8 Pica		5 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4082	0.6103	0.8147	1.0185
7.5		0.3810	0.5696	0.7604	0.9506
8		0.3572	0.5340	0.7128	0.8912
9		0.3175	0.4747	0.6336	0.7922
10		0.2857	0.4272	0.5703	0.7129
12	<u>EM</u> 8.42	0.2381	0.3560	0.4752	0.5941
Rate/Square		7.07	10.57	14.11	17.64

8 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4121	0.6161	0.8224	1.0282
7.5		0.3846	0.5750	0.7676	0.9596
8		0.3606	0.5391	0.7196	0.8996
9		0.3205	0.4792	0.6397	0.7997
10		0.2885	0.4313	0.5757	0.7197
12	<u>EM</u> 8.5	0.2404	0.3594	0.4797	0.5998
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4363	0.6523	0.8708	1.0886
7.5		0.4072	0.6088	0.8127	1.0161
8		0.3818	0.5708	0.7619	0.9526
9		0.3394	0.5074	0.6773	0.8467
10		0.3054	0.4566	0.6096	0.7620
12	<u>EM</u> 9	0.2545	0.3805	0.5080	0.6350
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		2 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4446	0.6646	0.8872	1.1092
7.5		0.4149	0.6203	0.8281	1.0353
8		0.3890	0.5816	0.7763	0.9706
9		0.3458	0.5169	0.6901	0.8627
10		0.3112	0.4652	0.6211	0.7764
12	EM 9.17	0.2593	0.3877	0.5176	0.6470
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		4 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4523	0.6762	0.9027	1.1286
7.5		0.4222	0.6312	0.8425	1.0533
8		0.3958	0.5917	0.7899	0.9875
9		0.3518	0.5260	0.7021	0.8778
10		0.3166	0.4734	0.6319	0.7900
12	EM 9.33	0.2639	0.3945	0.5266	0.6583
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		5 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4567	0.6828	0.9114	1.1394
7.5		0.4262	0.6372	0.8507	1.0635
8		0.3996	0.5974	0.7975	0.9970
9		0.3552	0.5310	0.7089	0.8862
10		0.3197	0.4779	0.6380	0.7976
12	EM 9.42	0.2664	0.3983	0.5317	0.6647
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4606	0.6886	0.9192	1.1491
7.5		0.4299	0.6427	0.8579	1.0725
8		0.4030	0.6025	0.8043	1.0055
9		0.3582	0.5355	0.7149	0.8938
10		0.3224	0.4820	0.6434	0.8044
12	EM 9.5	0.2687	0.4017	0.5362	0.6703
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		8 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4688	0.7009	0.9356	1.1697
7.5		0.4375	0.6542	0.8732	1.0917
8		0.4102	0.6133	0.8187	1.0235
9		0.3646	0.5451	0.7277	0.9098
10		0.3282	0.4906	0.6549	0.8188
12	EM 9.67	0.2735	0.4088	0.5458	0.6823
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4727	0.7067	0.9434	1.1794
7.5		0.4412	0.6596	0.8805	1.1007
8		0.4136	0.6183	0.8254	1.0319
9		0.3676	0.5496	0.7337	0.9173
10		0.3309	0.4947	0.6603	0.8256
12	EM 9.75	0.2757	0.4122	0.5503	0.6880
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		10 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4766	0.7125	0.9511	1.1890
7.5		0.4448	0.6650	0.8877	1.1098
8		0.4170	0.6234	0.8322	1.0404
9		0.3707	0.5541	0.7397	0.9248
10		0.3336	0.4987	0.6658	0.8323
12	EM 9.83	0.2780	0.4156	0.5548	0.6936
Rate/Square		7.07	10.57	14.11	17.64

9 Pica		11 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.4809	0.7190	0.9598	1.1999
7.5		0.4489	0.6711	0.8958	1.1199
8		0.4208	0.6291	0.8398	1.0499
9		0.3741	0.5592	0.7465	0.9333
10		0.3366	0.5033	0.6719	0.8399
12	EM 9.92	0.2805	0.4194	0.5599	0.7000
Rate/Square		7.07	10.57	14.11	17.64

10 Pica		5 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.5052	0.7552	1.0082	1.2604
7.5		0.4715	0.7049	0.9410	1.1764
8		0.4420	0.6608	0.8822	1.1029
9		0.3929	0.5874	0.7841	0.9803
10		0.3536	0.5287	0.7057	0.8823
12	EM 10.42	0.2947	0.4406	0.5881	0.7352
Rate/Square		7.07	10.57	14.11	17.64

11 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.5454	0.8154	1.0885	1.3608
7.5		0.5090	0.7610	1.0159	1.2701
8		0.4772	0.7135	0.9524	1.1907
9		0.4242	0.6342	0.8466	1.0584
10		0.3818	0.5708	0.7619	0.9526
12	EM 11.25	0.3182	0.4757	0.6350	0.7938
Rate/Square		7.07	10.57	14.11	17.64

11 Pica		7 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.5614	0.8393	1.1204	1.4007
7.5		0.5240	0.7834	1.0457	1.3073
8		0.4912	0.7344	0.9804	1.2256
9		0.4366	0.6528	0.8714	1.0894
10		0.3930	0.5875	0.7843	0.9805
12	EM 11.58	0.3275	0.4896	0.6536	0.8171
Rate/Square		7.07	10.57	14.11	17.64

12 Pica		5 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.6021	0.9002	1.2017	1.5023
7.5		0.5620	0.8402	1.1216	1.4022
8		0.5269	0.7877	1.0515	1.3145
9		0.4683	0.7002	0.9346	1.1685
10		0.4215	0.6301	0.8412	1.0516
12	EM 12.42	0.3512	0.5251	0.7010	0.8764
Rate/Square		7.07	10.57	14.11	17.64

12 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.6181	0.9241	1.2336	1.5422
7.5		0.5769	0.8625	1.1514	1.4394
8		0.5409	0.8086	1.0794	1.3495
9		0.4808	0.7188	0.9595	1.1995
10		0.4327	0.6469	0.8635	1.0796
12	EM 12.75	0.3606	0.5391	0.7196	0.8996
Rate/Square		7.07	10.57	14.11	17.64

13 Pica		2 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.6385	0.9546	1.2743	1.5930
7.5		0.5959	0.8909	1.1893	1.4868
8		0.5587	0.8352	1.1150	1.3939
9		0.4966	0.7424	0.9911	1.2390
10		0.4469	0.6682	0.8920	1.1151
12	EM 13.17	0.3724	0.5568	0.7433	0.9293
Rate/Square		7.07	10.57	14.11	17.64

14 Pica		2 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.6870	1.0270	1.3710	1.7140
7.5		0.6412	0.9586	1.2796	1.5997
8		0.6011	0.8987	1.1996	1.4998
9		0.5343	0.7988	1.0663	1.3331
10		0.4809	0.7189	0.9597	1.1998
12	EM 14.17	0.4007	0.5991	0.7998	0.9998
Rate/Square		7.07	10.57	14.11	17.64

14 Pica		7 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.7068	1.0568	1.4107	1.7636
7.5		0.6597	0.9863	1.3166	1.6460
8		0.6185	0.9247	1.2343	1.5431
9		0.5498	0.8219	1.0972	1.3717
10		0.4948	0.7397	0.9875	1.2345
12	EM 14.58	0.4123	0.6164	0.8229	1.0288
Rate/Square		7.07	10.57	14.11	17.64

14 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.7151	1.0691	1.4271	1.7842
7.5		0.6674	0.9978	1.3320	1.6652
8		0.6257	0.9354	1.2487	1.5611
9		0.5562	0.8315	1.1100	1.3877
10		0.5006	0.7484	0.9990	1.2489
12	EM 14.75	0.4171	0.6236	0.8325	1.0408
Rate/Square		7.07	10.57	14.11	17.64

15 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.7272	1.0872	1.4513	1.8144
7.5		0.6787	1.0147	1.3546	1.6934
8		0.6363	0.9513	1.2699	1.5876
9		0.5656	0.8456	1.1288	1.4112
10		0.5090	0.7610	1.0159	1.2701
12	EM 15	0.4242	0.6342	0.8466	1.0584
Rate/Square		7.07	10.57	14.11	17.64

15 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.7636	1.1416	1.5239	1.9051
7.5		0.7127	1.0655	1.4223	1.7781
8		0.6681	0.9989	1.3334	1.6670
9		0.5939	0.8879	1.1852	1.4818
10		0.5345	0.7991	1.0667	1.3336
12	EM 15.75	0.4454	0.6659	0.8889	1.1113
Rate/Square		7.07	10.57	14.11	17.64

17 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.8363	1.2503	1.6690	2.0866
7.5		0.7805	1.1669	1.5577	1.9475
8		0.7317	1.0940	1.4604	1.8257
9		0.6504	0.9724	1.2981	1.6229
10		0.5854	0.8752	1.1683	1.4606
12	EM 17.25	0.4878	0.7293	0.9736	1.2172
Rate/Square		7.07	10.57	14.11	17.64

19 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9211	1.3771	1.8383	2.2982
7.5		0.8597	1.2853	1.7158	2.1450
8		0.8060	1.2050	1.6085	2.0110
9		0.7164	1.0711	1.4298	1.7875
10		0.6448	0.9640	1.2868	1.6088
12	EM 19	0.5373	0.8033	1.0724	1.3406
Rate/Square		7.07	10.57	14.11	17.64

19 Pica		4 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9371	1.4010	1.8703	2.3382
7.5		0.8746	1.3076	1.7456	2.1823
8		0.8200	1.2259	1.6365	2.0459
9		0.7289	1.0897	1.4546	1.8186
10		0.6560	0.9807	1.3092	1.6367
12	EM 19.33	0.5467	0.8173	1.0910	1.3639
Rate/Square		7.07	10.57	14.11	17.64

19 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9454	1.4134	1.8867	2.3587
7.5		0.8823	1.3191	1.7609	2.2015
8		0.8272	1.2367	1.6509	2.0639
9		0.7353	1.0993	1.4674	1.8346
10		0.6618	0.9894	1.3207	1.6511
12	EM 19.5	0.5515	0.8245	1.1006	1.3759
Rate/Square		7.07	10.57	14.11	17.64

19 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9575	1.4315	1.9109	2.3890
7.5		0.8936	1.3360	1.7835	2.2297
8		0.8378	1.2525	1.6720	2.0903
9		0.7447	1.1134	1.4863	1.8581
10		0.6702	1.0020	1.3376	1.6723
12	EM 19.75	0.5585	0.8350	1.1147	1.3936
Rate/Square		7.07	10.57	14.11	17.64

19 Pica		10 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9614	1.4373	1.9186	2.3986
7.5		0.8973	1.3415	1.7907	2.2387
8		0.8412	1.2576	1.6788	2.0988
9		0.7477	1.1179	1.4923	1.8656
10		0.6730	1.0061	1.3430	1.6790
12	EM 19.83	0.5608	0.8384	1.1192	1.3992
Rate/Square		7.07	10.57	14.11	17.64

19 Pica		11 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9657	1.4438	1.9273	2.4095
7.5		0.9013	1.3475	1.7989	2.2489
8		0.8450	1.2633	1.6864	2.1083
9		0.7511	1.1230	1.4990	1.8741
10		0.6760	1.0107	1.3491	1.6867
12	EM 19.92	0.5633	0.8422	1.1243	1.4056
Rate/Square		7.07	10.57	14.11	17.64

20 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9817	1.4677	1.9593	2.4494
7.5		0.9163	1.3699	1.8287	2.2861
8		0.8590	1.2843	1.7144	2.1433
9		0.7636	1.1416	1.5239	1.9051
10		0.6872	1.0274	1.3715	1.7146
12	EM 20.25	0.5727	0.8562	1.1429	1.4288
Rate/Square		7.07	10.57	14.11	17.64

20 Pica		4 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9856	1.4735	1.9670	2.4591
7.5		0.9199	1.3753	1.8359	2.2952
8		0.8624	1.2893	1.7211	2.1517
9		0.7666	1.1461	1.5299	1.9126
10		0.6899	1.0315	1.3769	1.7214
12	EM 20.33	0.5749	0.8596	1.1474	1.4345
Rate/Square		7.07	10.57	14.11	17.64

20 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		0.9938	1.4858	1.9835	2.4797
7.5		0.9276	1.3868	1.8512	2.3144
8		0.8696	1.3001	1.7355	2.1697
9		0.7730	1.1557	1.5427	1.9286
10		0.6957	1.0401	1.3884	1.7358
12	EM 20.50	0.5797	0.8667	1.1570	1.4465
Rate/Square		7.07	10.57	14.11	17.64

21 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.0423	1.5583	2.0802	2.6006
7.5		0.9728	1.4544	1.9415	2.4273
8		0.9120	1.3635	1.8202	2.2756
9		0.8107	1.2120	1.6179	2.0227
10		0.7296	1.0908	1.4562	1.8204
12	EM 21.5	0.6080	0.9090	1.2135	1.5170
Rate/Square		7.07	10.57	14.11	17.64

21 Pica		7 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.0462	1.5641	2.0880	2.6103
7.5		0.9765	1.4598	1.9488	2.4363
8		0.9154	1.3686	1.8270	2.2840
9		0.8137	1.2165	1.6240	2.0302
10		0.7323	1.0949	1.4616	1.8272
12	EM 21.58	0.6103	0.9124	1.2180	1.5227
Rate/Square		7.07	10.57	14.11	17.64

22 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.0666	1.5946	2.1286	2.6611
7.5		0.9955	1.4883	1.9867	2.4837
8		0.9332	1.3952	1.8625	2.3285
9		0.8295	1.2402	1.6556	2.0698
10		0.7466	1.1162	1.4900	1.8628
12	EM 22	0.6222	0.9302	1.2417	1.5523
Rate/Square		7.07	10.57	14.11	17.64

22 Pica		1 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.0704	1.6004	2.1363	2.6708
7.5		0.9991	1.4937	1.9939	2.4927
8		0.9366	1.4003	1.8693	2.3369
9		0.8326	1.2447	1.6616	2.0773
10		0.7493	1.1203	1.4954	1.8696
12	EM 22.08	0.6244	0.9335	1.2462	1.5580
Rate/Square		7.07	10.57	14.11	17.64

22 Pica		10 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.1068	1.6547	2.2089	2.7615
7.5		1.0330	1.5444	2.0616	2.5774
8		0.9684	1.4479	1.9328	2.4163
9		0.8608	1.2870	1.7180	2.1478
10		0.7748	1.1583	1.5462	1.9331
12	EM 22.83	0.6456	0.9653	1.2885	1.6109
Rate/Square		7.07	10.57	14.11	17.64

23 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.1150	1.6670	2.2253	2.7821
7.5		1.0407	1.5559	2.0770	2.5966
8		0.9757	1.4587	1.9472	2.4343
9		0.8673	1.2966	1.7308	2.1638
10		0.7805	1.1669	1.5577	1.9475
12	EM 23	0.6504	0.9724	1.2981	1.6229
Rate/Square		7.07	10.57	14.11	17.64

23 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.1272	1.6852	2.2495	2.8123
7.5		1.0520	1.5728	2.0996	2.6248
8		0.9863	1.4745	1.9683	2.4608
9		0.8767	1.3107	1.7496	2.1874
10		0.7890	1.1796	1.5747	1.9686
12	EM 23.25	0.6575	0.9830	1.3122	1.6405
Rate/Square		7.07	10.57	14.11	17.64

24 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.1635	1.7395	2.3221	2.9030
7.5		1.0860	1.6236	2.1673	2.7095
8		1.0181	1.5221	2.0318	2.5402
9		0.9050	1.3530	1.8061	2.2579
10		0.8145	1.2177	1.6255	2.0321
12	EM 24	0.6787	1.0147	1.3546	1.6934
Rate/Square		7.07	10.57	14.11	17.64

25 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.2362	1.8482	2.4672	3.0845
7.5		1.1538	1.7250	2.3028	2.8788
8		1.0817	1.6172	2.1588	2.6989
9		0.9615	1.4375	1.9190	2.3990
10		0.8654	1.2938	1.7271	2.1591
12	EM 25.5	0.7211	1.0781	1.4392	1.7993
Rate/Square		7.07	10.57	14.11	17.64

26 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.2605	1.8845	2.5156	3.1450
7.5		1.1764	1.7588	2.3479	2.9353
8		1.1029	1.6489	2.2012	2.7518
9		0.9804	1.4657	1.9566	2.4461
10		0.8823	1.3191	1.7609	2.2015
12	EM 26	0.7353	1.0993	1.4674	1.8346
Rate/Square		7.07	10.57	14.11	17.64

26		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.2726	1.9026	2.5398	3.1752
7.5		1.1878	1.7758	2.3705	2.9635
8		1.1135	1.6648	2.2223	2.7783
9		0.9898	1.4798	1.9754	2.4696
10		0.8908	1.3318	1.7779	2.2226
12	EM 26.25	0.7424	1.1099	1.4816	1.8522
Rate/Square		7.07	10.57	14.11	17.64

29 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4180	2.1200	2.8301	3.5381
7.5		1.3235	1.9787	2.6414	3.3022
8		1.2408	1.8550	2.4763	3.0958
9		1.1029	1.6489	2.2012	2.7518
10		0.9926	1.4840	1.9810	2.4767
12	EM 29.25	0.8272	1.2367	1.6509	2.0639
Rate/Square		7.07	10.57	14.11	17.64

29 Pica		4 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4219	2.1258	2.8378	3.5478
7.5		1.3271	1.9841	2.6486	3.3112
8		1.2442	1.8601	2.4831	3.1043
9		1.1059	1.6534	2.2072	2.7594
10		0.9953	1.4881	1.9865	2.4834
12	EM 29.33	0.8295	1.2401	1.6554	2.0695
Rate/Square		7.07	10.57	14.11	17.64

29 Pica		6 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4302	2.1382	2.8543	3.5683
7.5		1.3348	1.9956	2.6640	3.3304
8		1.2514	1.8709	2.4975	3.1223
9		1.1123	1.6630	2.2200	2.7754
10		1.0011	1.4967	1.9980	2.4978
12	EM 29.5	0.8343	1.2473	1.6650	2.0815
Rate/Square		7.07	10.57	14.11	17.64

29 Pica		7 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4340	2.1440	2.8620	3.5780
7.5		1.3384	2.0010	2.6712	3.3395
8		1.2548	1.8760	2.5042	3.1307
9		1.1154	1.6675	2.2260	2.7829
10		1.0038	1.5008	2.0034	2.5046
12	EM 29.58	0.8365	1.2506	1.6695	2.0872
Rate/Square		7.07	10.57	14.11	17.64

29 Pica		8 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4384	2.1505	2.8707	3.5889
7.5		1.3425	2.0071	2.6793	3.3496
8		1.2586	1.8817	2.5119	3.1403
9		1.1188	1.6726	2.2328	2.7914
10		1.0069	1.5053	2.0095	2.5122
12	EM 29.67	0.8391	1.2544	1.6746	2.0935
Rate/Square		7.07	10.57	14.11	17.64

30 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4544	2.1744	2.9026	3.6288
7.5		1.3574	2.0294	2.7091	3.3869
8		1.2726	1.9026	2.5398	3.1752
9		1.1312	1.6912	2.2576	2.8224
10		1.0181	1.5221	2.0318	2.5402
12	EM 30	0.8484	1.2684	1.6932	2.1168
Rate/Square		7.07	10.57	14.11	17.64

30 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4665	2.1925	2.9268	3.6590
7.5		1.3688	2.0464	2.7317	3.4151
8		1.2832	1.9185	2.5610	3.2017
9		1.1406	1.7053	2.2764	2.8459
10		1.0266	1.5348	2.0488	2.5613
12	EM 30.25	0.8555	1.2790	1.7073	2.1344
Rate/Square		7.07	10.57	14.11	17.64

30 Pica		9 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4908	2.2288	2.9752	3.7195
7.5		1.3914	2.0802	2.7768	3.4716
8		1.3044	1.9502	2.6033	3.2546
9		1.1595	1.7335	2.3140	2.8930
10		1.0435	1.5601	2.0826	2.6037
12	EM 30.75	0.8696	1.3001	1.7355	2.1697
Rate/Square		7.07	10.57	14.11	17.64

30 Pica		10 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.4946	2.2346	2.9829	3.7292
7.5		1.3950	2.0856	2.7841	3.4806
8		1.3078	1.9552	2.6101	3.2630
9		1.1625	1.7380	2.3201	2.9005
10		1.0462	1.5642	2.0881	2.6104
12	EM 30.83	0.8719	1.3035	1.7400	2.1754
Rate/Square		7.07	10.57	14.11	17.64

31 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.5029	2.2469	2.9994	3.7498
7.5		1.4027	2.0971	2.7994	3.4998
8		1.3150	1.9660	2.6245	3.2810
9		1.1689	1.7476	2.3329	2.9165
10		1.0520	1.5728	2.0996	2.6248
12	EM 31	0.8767	1.3107	1.7496	2.1874
Rate/Square		7.07	10.57	14.11	17.64

31 Pica		2 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.5111	2.2592	3.0158	3.7703
7.5		1.4104	2.1086	2.8148	3.5190
8		1.3222	1.9768	2.6389	3.2990
9		1.1753	1.7572	2.3456	2.9325
10		1.0578	1.5814	2.1111	2.6392
12	EM 31.17	0.8815	1.3179	1.7592	2.1994
Rate/Square		7.07	10.57	14.11	17.64

31 Pica		3 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.5150	2.2650	3.0236	3.7800
7.5		1.4140	2.1140	2.8220	3.5280
8		1.3256	1.9819	2.6456	3.3075
9		1.1783	1.7617	2.3517	2.9400
10		1.0605	1.5855	2.1165	2.6460
12	EM 31.25	0.8838	1.3213	1.7638	2.2050
Rate/Square		7.07	10.57	14.11	17.64

33 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.5998	2.3918	3.1929	3.9917
7.5		1.4932	2.2324	2.9800	3.7256
8		1.3999	2.0929	2.7938	3.4927
9		1.2443	1.8603	2.4834	3.1046
10		1.1199	1.6743	2.2350	2.7942
12	EM 33	0.9332	1.3952	1.8625	2.3285
Rate/Square		7.07	10.57	14.11	17.64

34 Pica		1 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.6522	2.4701	3.2974	4.1223
7.5		1.5421	2.3054	3.0776	3.8475
8		1.4457	2.1614	2.8852	3.6070
9		1.2850	1.9212	2.5646	3.2062
10		1.1565	1.7291	2.3082	2.8856
12	EM 34.08	0.9638	1.4409	1.9235	2.4047
Rate/Square		7.07	10.57	14.11	17.64

35 Pica		8 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.7293	2.5854	3.4512	4.3146
7.5		1.6140	2.4130	3.2211	4.0270
8		1.5131	2.2622	3.0198	3.7753
9		1.3450	2.0108	2.6843	3.3558
10		1.2105	1.8098	2.4159	3.0203
12	EM 35.67	1.0087	1.5081	2.0132	2.5169
Rate/Square		7.07	10.57	14.11	17.64

39 Pica		0 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.8907	2.8267	3.7734	4.7174
7.5		1.7647	2.6383	3.5219	4.4029
8		1.6544	2.4734	3.3017	4.1278
9		1.4706	2.1986	2.9349	3.6691
10		1.3235	1.9787	2.6414	3.3022
12	EM 39	1.1029	1.6489	2.2012	2.7518
Rate/Square		7.07	10.57	14.11	17.64

39 Pica		5 Point Column			
Type Size		Number of Insertions			
		1	2	3	4
7		1.9111	2.8572	3.8141	4.7682
7.5		1.7837	2.6667	3.5598	4.4504
8		1.6722	2.5000	3.3373	4.1722
9		1.4864	2.2222	2.9665	3.7086
10		1.3378	2.0000	2.6698	3.3378
12	EM 39.42	1.1148	1.6667	2.2249	2.7815
Rate/Square		7.07	10.57	14.11	17.64