

Testimony for KS House Commerce Committee SB 154: Amending unemployment insurance benefits determination; employer classification and contribution rates.



March 13, 2015 - Topeka, Kansas

Submitted on behalf of KS SHRM and Unemployment Insurance Services

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Dear Members of the Committee:

My name is Phillip M. Hayes and I am here today on behalf of The Kansas State Council of the Society for Human Resource Management (KS SHRM) in support of SB 154. As Vice President, HR Services and Operations for The Arnold Group, A Human Resource Company in Wichita, Kansas, I am responsible for planning, directing and delivering Corporate and customized HR services in support of business objectives with extensive experience in recruiting, employee development and work force planning.

In addition, Jeff Oswald from Unemployment Insurance Services has been a key contributor in crafting SB 154 with feedback and recommendations from the KS UI Task Group as well as his clients from across all 50 states. We represent a broad coalition of employers who have voiced their support for this bill. This group includes clients of Mr. Oswald's company, industry associations and groups, as well as many other individual employers. For the past year, a group represented by many of these same employers and associations have engaged in an exhaustive review of the unemployment tax rate methodology currently used by the State of Kansas. As a result of this review, this group has formulated a reform to this methodology that would shift the method from the current arrayed system to a fixed tax rate schedule. Our goals in this project have been to provide a predictable and stable, and most importantly, a responsible method of funding the KS unemployment trust fund.

The consensus of Kansas employers has been that the current system not only over-taxes their organizations, but is also prone to huge variances in their annual tax liability. These variances make it difficult to plan and budget for this important expense. This frustration is only exacerbated by the feeling that they are being over-taxed by a system that does not reward "good players" in the system. This frustration is amplified further when a comparison is made of surrounding states and how their individual experience rating would be reflected in those tax rate systems. Of all the employers engaged in this process, most would have a significantly better tax rate in the surrounding states if their experience was applied to the comparison states tax tables.

How does amended SB 154 compare to HB 2261 as heard on February 12, 2015? There are two primary differences between the two bills, which were initially identical when introduced. After working with the Kansas Department of Labor (KDOL), the KS UI Task Group adopted two (2) primary changes recommended by KDOL:

- 1. Adopted alternative Trust Fund Controls to provide more long-term stability to the trust fund and minimize the potential occurrence of surcharge schedules.
- 2. Reduced the eight (8) rate schedules to six (6) schedules total.
 - Consolidated the three (3) credit schedules ranging from -0.20 to -0.60% to a single credit schedule offering a -0.50% credit once the trust fund exceeds the target threshold.

KS SHRM and Unemployment Insurance Services stands in strong support for SB 154 as we believe this reform will accomplish several key items:

- 1. Provides a method in which to responsibly finance the trust fund while providing employers with much needed tax relief.
- 2. Puts a premium on each individual employer to properly manage their claims and charge experience.
 - Employers who are not utilizing the system will be merit rated accordingly and will experience downward mobility if they maintain favorable reserve ratios.
- 3. Not over-penalize employers who experience growth or have an isolated poor year in experience.
 - These employers will see an increase in their tax rate, but the increase will be slower and modest compared to the current system.
- 4. This reform will make the Kansas system more competitive with surrounding states.
- 5. The system has been built with automatic "solvency surcharges" to help the trust fund account for variances in the payment of benefit charges.
 - These surcharges are based on the overall health of the trust fund and will be automatically triggered/implemented based on the actual health/balance of the trust fund.

To assist in the ensuring the solvency of the trust fund, this bill contains other key elements in addition to the solvency surcharges. This bill will cease the indexing of the maximum weekly benefit amount to the average wages of the state. Currently, Kansas has the ninth highest weekly benefit amount in the US. The bill will freeze the benefit amount at the current rate and future increases will be addressed statutorily. We are also maintaining the increase of the taxable wage base to \$14,000 per employee.

Historically, part of the issues with the funding mechanism has been that the taxable wage base has been static at \$8,000 since 1983 while at the same time the benefit amounts were increasing annually since 1996. These two elements combined will allow the taxable wage base to remain in line with weekly benefit amount and can be evaluated as a combined unit and addressed statutorily in the future.

In conclusion, for the past year, our group has performed detailed analysis and comparisons of not only how the trust fund would perform in our proposed system, but how this system would impact individual employers. It is our opinion that we have devised a system that will responsibly finance the trust fund, but at a more measured rate of growth. This measured growth will allow employers to receive a merit rating that is based on their actual experience and use of the system. The fixed system outlined in SB 154 will put a premium on workforce and claims management for all employers engaged in the process in a proper manner. This reform will allow Kansas to have a more competitive tax rate system that is comparable with other states. Finally, it will provide tax relief for a vast majority of Kansas employers and provide them with a responsible and more predictable funding mechanism.

Thank you for your time and consideration of our proposed legislation and also for your service to our great state. I would be happy to stand for questions now or at the appropriate time. Additionally, I can be contacted at 316.619.7864 or by email at phayes@the-arnold-group.com for questions/concerns.

Respectfully,

Phillip M. Hayes, SPHR Immediate-Past Director

KS SHRM

Jeff Oswald President/CEO

Unemployment Insurance Services

KS Unemployment Insurance Reform Bill Summary Information

·	System (No Rate Schedules) Annual Contribution Summary
Year	Total Contributions
2015	*\$467,900,000
2014	\$381,728,490
2013	\$401,530,406
2012	\$401,512,998
2011	\$388,535,350
2010	\$350,391,756
2009	\$200,866,566
2008	\$216,832,816
2007	\$228,187,000
2006	\$328,504,192
2005	\$343,853,455
2004	\$298,182,587
2003	\$226,508,847
2002	\$182,442,799
2001	\$172,883,381
2000	\$142,974,512
3 Yr. (Actuals) Avg.	\$394,923,965
5 Yr. (Actuals) Avg.	\$384,739,800
10 Yr. (Actuals) Avg.	\$324,194,303
15 Yr. (Actuals) Avg.	\$284,329,010

Kansas UI Benefits Summary Including <i>The Great Recession</i> (1995-2014)						
Averages	Weekly	**Annual				
2014	\$5,630,605	\$292,791,467				
3 Yr. Avg.	\$6,634,149	\$344,975,735				
5 Yr. Avg.	\$7,636,067	\$397,075,488				
10 Yr. Avg.	\$7,294,137	\$379,295,118				
15 Yr. Avg.	\$6,733,093	\$350,120,821				
20 Yr. Avg	\$5,741,543	\$298,560,225				
High Yr. (2009)	\$14,881,228	\$773,823,847				
Low Yr. (1998)	\$2,510,933	\$130,568,497				

	Kansas UI Benefits Summ Prior to The Great Recession (19	
Averages	Weekly	**Annual
2008	\$6,173,148	\$321,003,702
3 Yr. Avg.	\$4,987,367	\$259,343,085
5 Yr. Avg.	\$5,108,423	\$265,638,005
10 Yr. Avg.	\$5,095,931	\$264,988,427
15 Yr. Avg.	\$4,330,397	\$225,180,637
20 Yr. Avg	\$4,069,486	\$211,613,278
High Yr. (2003)	\$7,464,547	\$388,156,425
Low Yr. (1998)	\$2,510,933	\$130,568,497

^{*} This is the planned/anticipated yield (employer contributions) for Calendar Year 2015.

	Kansas UI Trust Fu	nd Balance Summary (7/31)	
Year	Balance	Year	Balance
2017	*\$454,843,805	1999	\$519,654,159
2016	*\$498,393,624	1998	\$574,987,475
2015	\$435,071,121	1997	\$621,436,243
2014	\$232,809,126	1996	\$675,364,102
2013	\$169,323,408	1995	\$729,808,088
2012	\$47,127,702	1994	\$724,639,490
2011	(\$7,973,318)	1993	\$666,700,054
2010	\$29,218,341	1992	\$623,380,400
2009	\$348,964,208	1991	\$581,678,435
2008	\$666,960,942	1990	\$534,998,085
2007	\$654,374,058		
2006	\$619,927,139	1990) - 2008 Summary
2005	\$487,157,612	3 Yr. (Actuals) Avg.	\$647,087,380
2004	\$372,863,939	5 Yr. (Actuals) Avg.	\$560,256,738
2003	\$395,206,626	10 Yr. (Actuals) Avg.	\$526,255,591
2002	\$515,427,630	20 Yr. (Actuals) Avg.	\$572,586,087
2001	\$508,852,962	High Yr. (1995)	\$729,808,088
2000	\$522,130,844	Low Yr. (2004)	\$372,863,939

^{*} Estimated balance under the KS UI Work Group Fixed System Proposal

** KS UI bill provisions passed in 2013:

KS HB 2105 - Inc. Tax Wage Base (2015, 2016), Amends Alternate Base Period, Hol./Vac. Pay Provisions, Defines Good Cause, Drug Tests.

KS SB 149 - Requires Drug Screening for Recipients of Cash Assistance and UI Benefits.

KS SB 187 - Establishing Workers Compensation and Employment Security Boards Nominating Cmte.

** KS UI bill provisions passed in 2014:

KS HB 2576 - Amends Criteria for Eligibility for New Employer Rate for Entering & Expanding Employers.

KS SB 371 - Amends Disposition of Penalty Funds and Disclosure of Confidential Information.

KS SB 372 - Amends Work Sharing Plan, Requires Benefits and Retirement Paid and Same Level.

SB 154: KS Employer by Industry Distribution Summary

		All Ra	ted ERs	Neg. Balanc	ed Rated ERs	Pos. Balance	ed Rated ERs
Sector	Description	50,155	100.00%	6,298	12.56%	43,857	87.44%
		Count	%	Count	%	Count	%
11	Agriculture, Forestry, Fishing and Hunting	1,091	2.18%	36	0.07%	1,055	2.10%
21	Mining, Quarrying, and Oil and Gas Extraction	810	1.62%	88	0.18%	722	1.44%
22	Utilities	110	0.22%	9	0.02%	101	0.20%
23	Construction	5,359	10.69%	1,739	3.47%	3,620	7.22%
31	Manufacturing	317	0.63%	41	0.08%	276	0.55%
32	Manufacturing	756	1.51%	165	0.33%	591	1.18%
33	Manufacturing	1,389	2.77%	353	0.70%	1,036	2.07%
42	Wholesale Trade	4,687	9.35%	674	1.34%	4,013	8.00%
44	Retail Trade	4,452	8.88%	298	0.59%	4,154	8.28%
45	Retail Trade	1,308	2.61%	84	0.17%	1,224	2.44%
48	Transportation and Warehousing	1,465	2.92%	208	0.42%	1,257	2.51%
49	Transportation and Warehousing	194	0.39%	32	0.06%	162	0.32%
51	Information	647	1.29%	89	0.18%	558	1.11%
52	Finance and Insurance	3,178	6.34%	216	0.43%	2,962	5.91%
53	Real Estate and Rental and Leasing	1,832	3.65%	184	0.37%	1,648	3.29%
54	Professional, Scientific, and Technical Services	6,122	12.21%	696	1.39%	5,426	10.82%
55	Management of Companies and Enterprises	219	0.44%	22	0.04%	197	0.39%
56	Admin & Support and Waste Mgmt & Remediation Srvcs	3,128	6.24%	636	1.27%	2,492	4.97%
61	Educational Services	453	0.90%	34	0.07%	419	0.84%
62	Health Care and Social Assistance	4,437	8.85%	199	0.40%	4,238	8.45%
71	Arts, Entertainment, and Recreation	637	1.27%	56	0.11%	581	1.16%
72	Accommodation and Food Services	3,006	5.99%	87	0.17%	2,919	5.82%
81	Other Services (except Public Administration)	4,412	8.80%	338	0.67%	4,074	8.12%
92	Public Administration	146	0.29%	14	0.03%	132	0.26%

There are businesses from EVERY industry rated as positive AND negative balanced employers. This table demonstrates the distribution of KS employers as of January 1, 2015.

KS Unemployment Insurance Reform Bill Summary Information

Kansas is uncompetitive when compared to other states:

	Summary Comparison for 7 of 44 States w/ Fixed System Contribution Rates & Est. Contributions for Rated Employers Only										
State # of Rate Schedules Reserve Ratio for Best Rate Group * # of Rate Groups Min. Contribution Rate & Amount per EE Max. Contribution Rate & Amount per EE Taxable Wage											
CA	8	20.000%	38	0.10%	\$7.00	6.20%	\$434.00	\$7,000.00			
DC	6	10.000%	17	0.10%	\$9.00	7.40%	\$666.00	\$9,000.00			
LA	6	9.500%	62	0.10%	\$7.70	6.20%	\$477.40	\$7,700.00			
MO	6	15.000%	38	0.00%	\$0.00	7.80%	\$1,014.00	\$13,000.00			
NM	7	10.000%	15	0.03%	\$7.02	5.40%	\$1,263.60	\$23,400.00			
TN	6	20.000%	24	0.01%	\$0.90	10.00%	\$900.00	\$9,000.00			
WV	5	18.000%	15	0.00%	\$0.00	4.50%	\$540.00	\$12,000.00			

^{*} KS: 2015 RR for Best Rate Group is 33.063%; 2000-2015 Average is 29.529%

Trust Fund Controls and Solvency Adjustments in HB 2261 and original SB 154

Rate Schedules	Trust Fund Control (TF Balance)			KS UI Work Group Fixed System: Contribution Rates & Est. Total Contributions				
	Lower	Upper	Solvency Adjustment (%)	Min. Contribution Rate & Amount per EE		Min. Contribution Rate & Amount per EE		Total Calendar Year Est. Contributions***
1	-\$7,090,777,141.23	\$141,815,542.81	1.60	1.80%	\$252	9.20%	\$1,288	\$463,682,903
2	\$141,815,542.82	\$212,723,314.22	1.40	1.60%	\$224	9.00%	\$1,260	\$436,877,746
3	\$212,723,314.24	\$319,084,971.34	1.20	1.40%	\$196	8.80%	\$1,232	\$410,072,589
4	\$319,084,971.36	\$425,446,628.46	1.00	1.20%	\$168	8.60%	\$1,204	\$383,267,432
5	\$425,446,628.47	\$709,077,714.11	0.00	0.20%	\$28	7.60%	\$1,064	\$249,241,647
6	\$709,077,714.12	\$815,439,371.23	-0.20	0.00%	\$0	7.60%	\$1,064	\$226,267,687
7	\$815,439,371.24	\$957,254,914.06	-0.40	0.00%	\$0	7.60%	\$1,064	\$219,799,955
8	\$957,254,914.07	\$7,090,777,141.23	-0.60	0.00%	\$0	7.60%	\$1,064	\$213,695,771

^{***} New/Inelegible Employers account for \$18M-\$24M annually in past years. \$22M is used for the Total Calendar Year Est. Contributions for each rate schedule.

Alternative Trust Fund Controls and Solvency Adjustments offered by KDOL

	True	st Fund Control (TF Ba	alanco)		KDOL Fixed System:					
Rate Schedules	ITUS	st Fulla Collitor (1F B	alalice		Contribution Rates & Est. Total Contributions					
nuic concumes	Lower Upper		Solvency Adjustment (%)	Min. Rate 27.000% Reserve Ratio	Min. Amt. per EE	Max. Rate	Max. Amt per EE	Total Calendar Year Est. Contributions***		
1	-\$7,090,777,141.23	\$141,815,542.81	2.00	2.20%	\$308	10.00%	\$1,400	\$615,636,176		
2	\$141,815,542.82	\$319,084,971.34	1.40	1.60%	\$224	9.40%	\$1,316	\$535,220,705		
3	\$319,084,971.36	\$425,446,628.46	1.00	1.20%	\$168	9.00%	\$1,260	\$481,610,391		
4	\$425,446,628.47	\$531,808,285.58	0.40	0.60%	\$84	8.40%	\$1,176	\$401,194,919		
5	\$531,808,285.59	\$815,439,371.23	0.00	0.20%	\$28	8.00%	\$1,120	\$347,584,605		
6	\$815,439,371.24	\$921,801,028.35	-0.20	0.00%	\$0	8.00%	\$1,120	\$324,610,645		
7	\$921,801,028.36	\$1,063,616,571.18	-0.40	0.00%	\$0	8.00%	\$1,120	\$303,078,277		
8	\$1,063,616,571.19	\$7,090,777,141.23	-1.00	0.00%	\$0	8.00%	\$1,120	\$247,329,539		

^{***} New/Inelegible Employers account for \$18M-\$24M annually in past years. \$22M is used for the Total Calendar Year Est. Contributions for each rate schedule.

Amended SB 154 Trust Fund Controls & Solvency Adjustment Summary

Rate Schedules	Trust Fund Control (TF Balance)			KS UI Work Group Fixed System: Contribution Rates & Est. Total Contributions				
	Lower	Upper	Solvency Adjustment (%)	Min. Contribution Rate & Amount per EE		Min. Contribution Rate & Amount per EE		Total Calendar Year Est. Contributions***
1	-\$7,090,777,141.23	\$141,815,542.81	1.60	1.80%	\$252	9.20%	\$1,288	\$463,679,462
2	\$141,815,542.82	\$319,084,971.34	1.40	1.60%	\$224	9.00%	\$1,260	\$436,874,305
3	\$319,084,971.36	\$425,446,628.46	1.20	1.40%	\$196	8.80%	\$1,232	\$410,069,148
4	\$425,446,628.47	\$531,808,285.58	1.00	1.20%	\$168	8.60%	\$1,204	\$383,263,991
5	\$531,808,285.59	\$815,439,371.23	0.00	0.20%	\$28	7.60%	\$1,064	\$249,238,206
6	\$815,439,371.24	\$7,090,777,141.23	-0.50	0.00%	\$0	7.60%	\$1,064	\$216,744,422

^{***} New/Inelegible Employers account for \$18M-\$24M annually in past years. \$22M is used for the Total Calendar Year Est. Contributions for each rate schedule.

Tax Impact on Business: Amended SB 154 offers Parity and Predictability to ERs

	Rate Schedules	E		A Cost Comparison erve Ratio: Rate Gro	up 4	Est. Annual SUTA Cost Comparison ER with a 5.00% Reserve Ratio: Rate Group 21			
		Co. A: 20 EEs	Co. B: 100 EEs	Co. C: 500 EEs	Co. D: 1,000 EEs	Co. A: 20 EEs	Co. B: 100 EEs	Co. C: 500 EEs	Co. D: 1,000 EEs
1.60%	1	\$6,720	\$33,600	\$168,000	\$336,000	\$16,240	\$81,200	\$406,000	\$812,000
1.40%	2	\$6,160	\$30,800	\$154,000	\$308,000	\$15,680	\$78,400	\$392,000	\$784,000
1.20%	3	\$5,600	\$28,000	\$140,000	\$280,000	\$15,120	\$75,600	\$378,000	\$756,000
1.00%	4	\$5,040	\$25,200	\$126,000	\$252,000	\$14,560	\$72,800	\$364,000	\$728,000
0.00%	5	\$2,240	\$11,200	\$56,000	\$112,000	\$11,760	\$58,800	\$294,000	\$588,000
-0.50%	6	\$840	\$4,200	\$21,000	\$42,000	\$10,360	\$51,800	\$259,000	\$518,000

KDOL TFCs / KS UI Solv Surch & 18.590% RR - Standard Rate Schedule & Employer Impact w/ Schedule 2

	ard Rate Sch Schedule S			ced" latio Limits
Rate Group	Standard Rate	\$UTA Tax per EE	Lower RR Limit	Upper RR Limit
1	0.20%	\$28	18.590	1,000,000
2	0.40%	\$56	17.875	18.589
3	0.60%	\$84	17.160	17.874
4	0.80%	\$112	16.445	17.159
5	1.00%	\$140	15.730	16.444
6	1.20%	\$168	15.015	15.729
7	1.40%	\$196	14.300	15.014
8	1.60%	\$224	13.585	14.299
9	1.80%	\$252	12.870	13.584
10	2.00%	\$280	12.155	12.869
11	2.20%	\$308	11.440	12.154
12	2.40%	\$336	10.725	11.439
13	2.60%	\$364	10.010	10.724
14	2.80%	\$392	9.295	10.009
15	3.00%	\$420	8.580	9.294
16	3.20%	\$448	7.865	8.579
17	3.40%	\$476	7.150	7.864
18	3.60%	\$504	6.435	7.149
19	3.80%	\$532	5.720	6.434
20	4.00%	\$560	5.005	5.719
21	4.20%	\$588	4.290	5.004
22	4.40%	\$616	3.575	4.289
23	4.60%	\$644	2.860	3.574
24	4.80%	\$672	2.145	2.859
25	5.00%	\$700	1.430	2.144
26	5.20%	\$728	0.715	1.429
27	5.40%	\$756	0.000	0.714

N1	5.60%	\$784	-0.714	-0.001
N2	5.80%	\$812	-1.429	-0.715
N3	6.00%	\$840	-2.144	-1.430
N4	6.20%	\$868	-2.859	-2.145
N5	6.40%	\$896	-3.574	-2.860
N6	6.60%	\$924	-4.289	-3.575
N7	6.80%	\$952	-5.004	-4.290
N8	7.00%	\$980	-5.719	-5.005
N9	7.20%	\$1,008	-6.434	-5.720
N10	7.40%	\$1,036	-7.149	-6.435
N11	7.60%	\$1,064	-1,000,000.000	-7.150

Rate Schedule	Estimated Total		
1	\$463,679,462		
2	\$436,874,305		
3	\$410,069,148		
4	\$383,263,991		
5	\$249,238,206		
6	\$216,744,422		

Schedule 2: Employer Distribution Summary by Rate Group								
	Rated Employers		Contribu	itions	Taxable V	Vages		
Rate Groups	#	%	#	%	#	%		
1	35,497	70.77%	\$132,049,826	31.83%	\$8,253,114,122	61.58%		
2	692	1.38%	\$3,271,932	0.79%	\$181,773,989	1.36%		
3	644	1.28%	\$4,763,285	1.15%	\$238,164,243	1.78%		
4	589	1.17%	\$5,000,290	1.21%	\$227,285,910	1.70%		
5	525	1.05%	\$8,556,989	2.06%	\$356,541,212	2.66%		
6	435	0.87%	\$3,909,669	0.94%	\$150,371,882	1.12%		
7	426	0.85%	\$5,167,679	1.25%	\$184,559,973	1.38%		
8	399	0.80%	\$5,023,262	1.21%	\$167,442,070	1.25%		
9	375	0.75%	\$4,905,529	1.18%	\$153,297,768	1.14%		
10	343	0.68%	\$3,150,845	0.76%	\$92,671,913	0.69%		
11	335	0.67%	\$4,837,292	1.17%	\$134,369,225	1.00%		
12	336	0.67%	\$6,226,697	1.50%	\$163,860,457	1.22%		
13	310	0.62%	\$3,520,357	0.85%	\$88,008,932	0.66%		
14	274	0.55%	\$5,366,656	1.29%	\$127,777,529	0.95%		
15	234	0.47%	\$3,946,901	0.95%	\$89,702,304	0.67%		
16	259	0.52%	\$3,363,876	0.81%	\$73,127,735	0.55%		
17	254	0.51%	\$4,060,238	0.98%	\$84,588,282	0.63%		
18	230	0.46%	\$4,754,136	1.15%	\$95,082,728	0.71%		
19	231	0.46%	\$4,200,137	1.01%	\$80,771,871	0.60%		
20	212	0.42%	\$4,991,300	1.20%	\$92,431,486	0.69%		
21	212	0.42%	\$4,856,182	1.17%	\$86,717,538	0.65%		
22	193	0.38%	\$3,712,460	0.89%	\$64,007,930	0.48%		
23	183	0.36%	\$3,796,226	0.92%	\$63,270,434	0.47%		
24	179	0.36%	\$3,960,297	0.95%	\$63,875,754	0.48%		
25	183	0.36%	\$3,757,656	0.91%	\$58,713,369	0.44%		
26	130	0.26%	\$2,920,440	0.70%	\$44,249,095	0.33%		
27	177	0.35%	\$4,841,756	1.17%	\$71,202,297	0.53%		
	43,857	87.44%	\$248,911,914	60.00%	\$11,486,980,048	85.71%		
N1	143	0.29%	\$9,494,656	2.29%	\$135,637,941	1.01%		
N2	132	0.26%	\$2,785,024	0.67%	\$38,680,891	0.29%		
N3	132	0.26%	\$4,013,201	0.97%	\$54,232,452	0.40%		
N4	116	0.23%	\$2,537,473	0.61%	\$33,387,808	0.25%		
N5	133	0.27%	\$3,866,837	0.93%	\$49,574,832	0.37%		
N6	136	0.27%	\$2,537,581	0.61%	\$31,719,764	0.24%		
N7	111	0.22%	\$2,212,517	0.53%	\$26,981,919	0.20%		
N8	101	0.20%	\$3,384,312	0.82%	\$40,289,426	0.30%		
N9	91	0.18%	\$5,963,690	1.44%	\$69,345,228	0.52%		
N10	92	0.18%	\$2,210,518	0.53%	\$25,119,524	0.19%		
N11	5,111	10.19%	\$126,956,582	30.60%	\$1,410,628,684	10.53%		
	6,298	12.56%	\$165,962,391	40.00%	\$1,915,598,467	14.29%		