EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U. S. Department of Labor Washington, D.C. 20210	CLASSIFICATION UI CORRESPONDENCE SYMBOL OWS/DUIO DATE August 15, 2006

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 04-06

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
ONE STOP CENTER SYSTEM LEADS

FROM: EMILY STOVER DeROCCO
Assistant Secretary

Emily Stover DeRocco

SUBJECT: **Plans to Phase out Penalty Mail Costs for "Employment Security" Programs and Availability of Supplemental Budget Funds for Conversion to Commercial Mail Methods**

1. **Purpose.** To inform state workforce agencies (SWAs) of the Employment and Training Administration's (ETA's) intention to eliminate its authority to pay the U.S. Postal Service (USPS) directly for "employment security" postage costs beginning Fiscal Year (FY) 2008. These plans include the following:

   - Phasing out ETA payment to the United States Postal Service (USPS) for state agency penalty mail and postal management costs beginning in Fiscal Year (FY) 2007 for states volunteering to be early implementers; beginning in FY 2008, all states will assume responsibility for paying their own postage costs as well as any postal management services currently provided to states through the Unemployment Insurance (UI) Supplemental Budget Request (SBR) process;
   - Implementing new procedures to fund UI, Foreign Labor Certification (FLC), Trade Adjustment Assistance (TAA), and Work Opportunity Tax Credit (WOTC) postage beginning with FY 2008;
   - Implementing new procedures to fund Wagner-Peyser (WP) and Workforce Information Grants (WIGs) beginning with Program Year (PY) 2008;
   - Providing guidance on the payment of postage costs for programs conducted by SWAs in cooperation with the Bureau of Labor Statistics (BLS) and Veterans Employment and Training Service (VETS);
   - Providing information on technical assistance available to states in converting from the (penalty mail) Official Mail Accounting System (OMAS) to commercial mail to improve general mail practices; and

- Soliciting UI SBRs from states for the purpose of implementing commercial mail programs and improving postage management.

2. **References.** General Administration Letter No. 6-89, Employment Security Mail; 39 U.S.C. 3202(a) (1) (E); Section 3.3 of the USPS Domestic Mail Manual; State Unemployment Insurance and Employment Service Operations Appropriations Language; Unemployment Insurance Program Letter (UIPL) No. 15-04; and ET Handbook No. 336, 18th Edition, State Quality Service Plan Planning and Reporting Guidelines.

3. **Background.** Under USPS requirements established in October 1993, states implemented direct accountability methods (meters, stamps, and permit numbers) for postal management systems that are in use today. This was the first time ETA had actual cost information for state postage costs. This information, which is discussed in-depth in Attachment 1, showed that postage costs vary widely among states.

   In FYs 1998 and 1999, ETA established a federal/state postage workgroup to review states' postage costs. The workgroup discussed various strategies and potential formulas for allocating postage resources to states and queried states on their mailing practices and postage costs. The results of the National Association of State Workforce Agencies (NASWA)/ETA work group's efforts informed this initiative.

4. **Impetus for Change.** Some states have been implementing new operating policies and procedures that should reduce postage costs, such as use of debit cards for paying benefits and direct deposit of benefits, electronic transmission of separation requests, Interactive Voice Response Systems to process weekly claim certifications and provide claim information, Internet tax registration, etc. As these new procedures are being planned and/or implemented, states have requested that they be permitted to "reinvest" the resulting postage savings in their program operations. While it is desirable to reward states that become more efficient, the current arrangements for financing SWAs' postage where the Department of Labor (DOL) pays USPS directly for SWA postage costs have not allowed ETA to approve these requests. In addition, the current arrangement does not provide states with financial incentives to make improvements.

5. **Changes Necessary to Convert from OMAS to Commercial Mail.** In FY 1994, states converted to direct mail accountability, which involved the installation of postage meters and the use of permits, stamps, and Business Reply Mail (BRM). Therefore, the biggest change involved in converting to commercial methods of payment is that, unlike the payment method used under OMAS where DOL pays USPS directly for SWA postage costs, states will need to ensure that funds are on deposit with the USPS for all payment methods (permits, meters, BRM, etc.) prior to mailing.

States will need to make arrangements with their local postal representative or local postal business service network and their meter manufacturer/vendor to initiate the following changes:

a) *Permit Mail* – Typically, permit mail (G-12) is used for large mass mailings where the content is the same. Currently, states have one G-12 mailing permit, and the fee is billed through OMAS. States will need to submit an application to their local post office for a state agency mailing permit and pay the permit fee. Funds must be on deposit prior to mailing when using permit mail. There is a one-time permit fee of $160 per local facility. There is an additional $160 annual mailing fee per site for those states that will be using the First Class mail presorting programs to obtain postage discounts.

b) *Business Reply Mail* – Currently, states have one BRM permit, and the fee is billed through OMAS. States will need to submit a BRM permit application for each mailing site that a state agency wishes to receive BRM. Unlike the current BRM, funds must be on deposit prior to mailing when using BRM permit mail. There is an annual BRM permit and renewal fee of $160 per unique permit number. States can save money by obtaining only one BRM permit and allowing all locations in the state to use the same number. Additionally, each location using the BRM permit will pay postage plus a per piece handling fee. Since the handling fee is determined on volume, states are encouraged to consult with their local post office to select the best option.

c) *Metered Mail* – Most states currently use penalty meters and the postage costs are billed through OMAS. When converting to commercial mail, states will need to contact their meter vendor. The vendor will need to change the meter heads on the meter from OMAS to commercial. The cost of conversion is dependent upon the vendor selected. In some cases, meters may need to be replaced with digital meters to keep current with postal requirements. Unlike penalty mail and the OMAS, funds must be on deposit prior to mailing when using metered mail.

A more detailed explanation is provided in <u>Guidelines for State Agencies to Convert From "Official Mail Accounting System" (OMAS) To Commercial Payment Systems for Postage</u>, which may be found on the Office of Workforce Security's Web site at : <u>www.ows.doleta.gov</u> under "Quick Links" Postage Initiative.

6. <u>New Postage Funding Arrangements</u>.

A. Unemployment Insurance postage funding processes

- **Base Allocation Process**

The method for developing state specific target amounts for UI postage expenses uses projected base weeks claimed and subject employer workloads to determine each state's share of total postage funds. This method is identical to the one used to generate the state specific amounts withheld from the base allocations for Federal payments to the USPS which have been attached for informational purposes only to previous years' state UI administrative planning targets.

- **Above-Base Process**

  The determination of above-base postage funding will be based exclusively on weeks claimed workload that was not included in the base allocation; subject employer activity is funded 100 percent in base. The regular UI base weeks claimed workload issued with the state UI administrative planning targets is a fiscal year total that must be converted to a quarterly equivalent base weeks claimed. The quarterly regular UI base weeks claimed will be subtracted from the actual regular UI weeks claimed as reported on the UI-3, and any weeks claimed in excess of the base weeks claimed will be considered above base workload. Trade and additional benefits weeks claimed will be added to regular UI above base weeks, and the resulting total will be multiplied by a unit cost (estimated to be 23 cents in FY 2007) for postage. The product will be the postage above base funding.

B. Wagner-Peyser postage funding process

ETA will provide $18 million that has been withheld from the WP national appropriation for postage costs directly to the states. The distribution will be based on each state's share of the total WP appropriation according to the statutory formula allocation. This methodology is identical to the one used to generate the state specific amounts for Federal payments to the USPS in the past.

C. Bureau of Labor Statistics Cooperative Agreements funding process

BLS will provide postage funding to SWAs directly. BLS will inform SWAs of the process it will use separately.

D. Jobs for Veterans' State Grants funding process

VETS will provide the $1.5 million, previously transferred to ETA for postage, directly to the states based upon each state's share of the total Jobs for Veterans' State Grant formula funding. A state's postage allocation will consist of approximately one percent of its statutory formula allocation, and VETS will inform State Workforce Agencies of the allocation process in a Veterans' Program Letter (VPL).

E. Miscellaneous ETA Workforce Grants and Programs

The FLC, TAA, WIG, and WOTC programs have been assessed a percentage of their national appropriation for postage costs. In PY 2006/FY 2006, the percentage was 2.9

percent or $2.0 million. Upon converting to commercial mail, these programs will no longer be assessed for postage, and the funds will be included in state grants.

7. **Postal Supplemental Budget Request Process.** The postal SBR process used to reimburse states for their use of vendors to bundle their UI mail to obtain discounts will be eliminated in FY 2007 for early implementers and in FY 2008 for all other states, and states will be expected to pay these costs out of their annual postage allocation.

8. **Technical Assistance.** All states should begin consulting with their local post office, which can provide assistance on contacting local postal representatives or their local postal business service network. These USPS representatives can provide technical assistance on what permit application forms to fill out and how to achieve the maximum postage discounts. States should also consult with their local meter manufacturer vendor who can guide them through the meter conversion process.

   States are encouraged to utilize www.USPS.com to find additional resources and guides to improve mail management programs. Additionally, the National Postal Forum is a national event that provides opportunities for state mail managers to attend seminars and workshops on the latest innovations in mail management. The Forum provides the opportunity for state mail managers to obtain information on operating efficient mail operations and to obtain information from experts and their colleagues in other states. Information regarding registration costs, dates, etc., can be found on www.USPS.com.

9. **Early Implementers**. ETA encourages states to assume responsibility for their postage and mail management costs beginning as early as October 1, 2006, on a voluntary basis. In doing so, the state agrees to convert to commercial mail prior to the conversion date. ETA will no longer reimburse USPS for early implementing states' FY 2007 penalty mail costs thereafter, and if USPS presents a postage bill on behalf of the state account, the amount billed will be recouped from the state.

   States may opt to convert effective at the beginning of a quarter. In a case where a state converts after the first quarter of FY 2007, its UI postage allocation will be adjusted according to its historical weeks claimed pattern, and its WP, FLC, TAA, WIG, and WOTC postage allocation will be 25 percent for each quarter remaining in the year.

   BLS and VETS will provide instructions to states on how BLS cooperative agreements and VETS funded programs will be provided postage funds.

   A state that wishes to implement before FY 2008 should notify Dale Ziegler, Deputy Administrator, Office of Workforce Security, 200 Constitution Ave. N.W., Room S-4231, Washington, D.C. 20210, indicating its intention to implement early and provide the date it will make the conversion. Questions may be directed to Mr. Ziegler at 202-693-2942 or Ziegler.Dale@dol.gov.

10. **Timeline.**

- ETA will provide all states with UI, FLC, TAA, WOTC postage allocations and cease paying the USPS for state UI postage costs, including VETS, beginning October 1, 2007, at which time states will pay the USPS directly.
- To accommodate FY implementation, ETA will provide all states with partial WP and WIG postage allocations in PY 2007 (covering 9 months beginning October 2007) and cease paying the USPS for state WP and WIG postage beginning October 2007, at which time states will pay the USPS directly. Full WP and WIG postage allocations will be provided beginning in PY 2008.
- States wishing to be early implementers may convert to commercial mail beginning October 1, 2006, and ETA will provide participating states with a postage allocation as described above. BLS and VETS will provide information for early implementers separately.

11. **Proper Use of Postage Resources.** State administrators should refer to General Administration Letter No. 6-89 for information on the proper use of postage funds.

12. **UI Supplemental Budget Requests for FY 2006.** Up to $50,000 per state is available in FY 2006 for use by states to make the changes noted in item #5 above to convert to commercial mail during FY 2007. These funds are also available to assess UI mailing operations, explore opportunities and available technologies to improve efficiency and reduce mailing costs, and install or modify systems or equipment to decrease mailing expenditures. See Attachment II for UI SBR instructions. SBRs are due to the National Office no later than September 15, 2006.

13. **Action Required.** State administrators and liaisons are requested to distribute this advisory to appropriate staff.

14. **Inquiries.** State administrators should contact their ETA regional office and DVET/VETS Regional Administrators as appropriate.

15. **Attachments.**

Attachment I - Penalty Mail Fact Sheet
Attachment II - Outline for FY 2006 Supplemental Budget Request for Penalty Mail Conversion and Postal Management Improvements
Attachment III - FY 2007 Preliminary Postage Allocations
Attachment IV – 3-Year Analysis – Average UI Work Load/Postage Costs

Attachment I

PENALTY MAIL FACT SHEET

Penalty mail allows for reimbursement of states' postage costs "after the fact," which the Department of Labor (DOL) pays directly to the United States Postal Service (USPS). The authorized users include the following programs/organizations:

> Unemployment Insurance (UI), Wagner-Peyser (WP), Foreign Labor Certification (FLC), Disaster Unemployment Assistance (DUA), Bureau of Labor Statistics (BLS) Cooperative Agreement, Trade Adjustment Assistance (TAA), Work Opportunity Tax Credit (WOTC), and the Disabled Veterans' Outreach and Local Veterans Employment programs (Veterans Programs).

The legal authority to use penalty mail is found at **39 U.S.C. 3202(a)(1)(E)**:

> "[T]he United States Employment Service and the system of employment offices operated by it in conformity with the provisions of sections 49-49c, 49d, 49e-49k of Title 29 [Wagner-Peyser Act], and all state employment systems which receive funds appropriated under authority of these sections" are authorized to use penalty mail.

Section 3.3 of the USPS Domestic Mail Manual interprets the penalty authority privilege granted to the "United States Employment Service" in 39 U.S.C. as encompassing "Employment Security Offices," which provides the authority to other DOL users and functions, e.g., UI – All mail prepared under 7.0, 8.0, 9.0, and 11.0 (sections in the manual) by state employment security offices is accepted without prepayment of postage and fees.

Additionally, the appropriations act provides DOL with the authority to pay the USPS directly for state postage costs. Since states do not pay their postage directly, their individual postage costs are essentially invisible. Thus, there is little incentive for states to aggressively manage their costs.

How the Current System Works

- DOL subtracts funds from state UI administration, WP, Foreign Labor Certification (FLC), Trade Adjustment Assistance (TAA), Workforce Information Grants (WIG), Work Opportunity Tax Credit (WOTC) appropriations to cover state postage costs before annual allocations are provided to the states. These funds are held by ETA, which pays monthly postage charges to the USPS for the states' employment security postage.
- ETA bills BLS for actual costs, and charges Veterans' programs an estimated amount.
- A few states use vendors to bundle their mail to obtain discounts and are reimbursed for

their postage costs through supplemental budget requests.

States' Postage Experience

Actual postage costs vary from state to state and are primarily influenced by UI claim workloads, WP usage, and state efficiency. Historically, postage costs have been approximately 4-5 percent of the appropriations, but vary depending upon the state of the economy. In the case of UI, recent postage costs have ranged from $76 million in FY 2000 to $142 million in FY 2004. Little information is available on actual WP, FLC, TAA, WIG, and WOTC postage costs; the USPS does not collect program specific information, and the ETA Office of Financial and Administrative Management (OFAM) has charged these programs approximately $20 million per year over the past five years for postage costs based upon estimation.

ETA reviewed UI postage expenditures for FY 2003, FY 2004 and FY 2005 (Attachment V) using Weeks Claimed and 4 times Subject Employers as a proxy for workload to assess state postal expenses and expressed the result as a postal workload index (PWI). The review revealed that in FY 2005 the average PWI was 0.62 and the median 0.66, ranging from a low of 0.42 to a high of 1.69. In FY 2003, the median was 0.70 and the range was 0.46 to 1.63. The wide range results from differing state practices in postal management, including the use of available discounts to reduce overall costs.

On several occasions, ETA has encouraged improvements in state postage handling with varying degrees of success. In FY 2005, ETA provided a $50,000 SBR opportunity for states to study and examine mailing operations, explore opportunities to improve efficiency and reduce mailing costs and to implement available technology to decrease state mailing expenditures in anticipation of this change; only 30 states requested funds. Previously, in FY 1992, ETA provided funding ($11.5 million) for states to purchase postal equipment to improve efficiencies and reduce costs; as a result, many states now participate in complicated postal discount rate programs (e.g., presorting, bar-coding etc.) and have reduced their postage costs. For example, a 39 cent letter can be mailed at the automated presorted three digit rate of 30.8 cents per piece or a 21 percent cost saving. Today, some states continue to use mail discount programs. A few states even use commercial mail practices wherein ETA pays the costs through SBRs.

Attachment II

OUTLINE FOR FY 2006 SUPPLEMENTAL BUDGET REQUEST FOR PENALTY MAIL CONVERSION AND POSTAL MANAGEMENT IMPROVEMENTS

Up to $50,000 per state is available in FY 2006 unemployment insurance (UI) funds for use by states to pay for the costs of converting to commercial mail and to improve efficiency and reduce mailing costs, and install or modify systems or equipment to decrease mailing expenditures.

Description of the Project:

Provide a brief description of the proposed use of the SBR funds converting from OMAS to commercial mail and/or making improvements to the state's UI postal management system. The description should explain the activities that the SWA will undertake and should substantiate the proposed project costs.

Instructions: Refer to Handbook No. 336 for instructions in completing supplemental budget requests.

Costs:

Cost expenditures must match those on the SF 424A. Provide brief explanations of the cost breakouts for staff, equipment, other expenditures, etc., for each project and sub-project.

Hardware, Software, Telecommunications Equipment, Contracted Services

Item	Number Requested	Cost Per Item	Total Cost

____

Staff (This format is used for SWA staff and/or for contract staff)

Position Title	# Hours	Cost Per Hour	Total

____

Identify other expenditures and include cost estimates.

____

State Contact: Provide name, telephone number and email address of the individual who can answer any questions relating to this proposal.

Amount of Funding Request for this Project: SBR funds may be used for one-time costs only and may not be used for ongoing costs, such as maintenance of software and hardware, or ongoing communications costs.

Staff costs are allowable only for staff not previously funded by the state's base grant. Costs for training and related travel expenses are allowable for base staff but salaries and benefits are not allowable for base staff attending training unless the state incurs additional expenses such as backfilling the staff position during the time that the employee attends training. Above base AS&T and NPS staff year costs must be based on the state PS and PB rate approved for the current year's UI grant.

Examples of how SBR funds may be used include the following:

- Converting OMAS meters to commercial meters, and payment of Permit Mail and Business Reply Mail (BRM) fees (see #5 in TEGL 4-06).
- Conducting a cost-benefit analysis of using contract services that will allow states to take advantage of presorting and automation discounts offered by the Postal Service to reduce postage costs.
- Replacing/updating mailing equipment to improve efficiency and reduce costs (for states that manage their own mail operation).
- Assessing current mailing processes to identify areas where additional efficiencies may be derived, including reviewing what is mailed and to whom it is being mailed, and, where applicable, reducing unnecessary redundancies in mailing.
- Modifying benefit or tax systems to ensure the most efficient print streams are used.

Any funds that are not used for automation acquisition expenditures must be obligated by December 31, 2006, and liquidated within 90 days of that date. Funds used for automation acquisition expenditures are available for obligation through September 30, 2008, and liquidated within 90 days of that date.

Due Date: SBR proposals must be received in the national office no later than September 15, 2006.

Send these SBRs and the required documents to the attention of: U. S. Department of Labor, Office of Workforce Security, ATTN: Jagruti Patel, 200 Constitution Avenue, NW, Room S-4231, Washington, D.C. 20210. A copy should be provided to the appropriate Regional Administrator. The state should ensure that the following is provided:

- **Original and two copies of each SBR proposal with supporting documentation.**
- **Completed forms SF 424 (revised 10-2005), 424a and 424b as required in ET Handbook 336, 18th Edition.**

Attachment III

FY 2007 Preliminary Postage Allocations

	FY 2007 UI Base Postage Allocation	FY 2007 Estimated Above Base Earnings (1)	PY 2006 Wagner-Peyser Postage Allocation	FY 2007/PY 2006 Total Postage Allocation (2)	FY 2005 Actual Postage Paid (3)
Total	103,513,037	4,585,000	18,000,000	126,098,037	123,741,514
Alabama	1,051,374	44,515	245,492	1,341,381	1,223,680
Alaska	508,335	25,488	195,669	729,492	590,861
Arizona	1,206,372	48,822	306,939	1,562,133	1,407,640
Arkansas	1,001,662	45,647	148,567	1,195,876	1,465,289
California	15,694,789	696,536	2,076,603	18,467,928	12,782,756
Colorado	1,235,365	44,797	282,169	1,562,331	2,145,948
Connecticut	1,431,172	64,090	198,486	1,693,748	1,622,107
Delaware	309,616	13,078	50,277	372,971	298,598
District of Columbia	302,595	12,364	71,335	386,294	374,149
Florida	4,230,359	159,197	891,781	5,281,337	4,742,672
Georgia	2,241,778	91,347	513,140	2,846,265	2,237,976
Hawaii	325,380	13,239	68,288	406,907	508,881
Idaho	547,135	22,947	163,027	733,109	645,839
Illinois	4,855,959	223,886	756,896	5,836,741	5,312,806
Indiana	1,912,423	86,229	362,249	2,360,901	3,032,186
Iowa	928,605	40,564	177,281	1,146,450	972,909
Kansas	751,621	30,722	163,467	945,810	1,257,803
Kentucky	1,236,986	55,384	235,037	1,527,407	1,183,508
Louisiana	1,118,746	46,952	259,444	1,425,142	1,838,112
Maine	444,783	18,202	96,950	559,935	752,079
Maryland	1,476,676	59,902	312,253	1,848,831	2,112,243
Massachusetts	2,939,014	134,061	378,379	3,451,454	3,846,220
Michigan	4,410,183	210,824	623,680	5,244,687	6,210,767
Minnesota	1,962,294	88,133	311,264	2,361,691	2,340,818
Mississippi	732,948	32,092	175,387	940,427	1,083,003
Missouri	1,924,576	85,256	342,172	2,352,004	2,561,113
Montana	350,507	13,824	133,226	497,557	515,808
Nebraska	538,729	22,522	160,112	721,363	789,960
Nevada	796,456	35,425	125,929	957,810	852,994
New Hampshire	301,724	10,441	74,288	386,453	387,935
New Jersey	4,309,181	198,345	486,859	4,994,385	4,326,782
New Mexico	465,520	19,050	149,503	634,073	660,358
New York	7,569,202	344,073	1,079,169	8,992,444	8,358,530
North Carolina	2,687,378	119,568	492,338	3,299,284	3,073,079
North Dakota	180,284	6,938	135,664	322,886	271,255
Ohio	3,644,742	165,684	687,745	4,498,171	5,317,368
Oklahoma	786,818	31,404	186,664	1,004,886	1,084,818

Oregon	1,608,003	72,356	231,181	1,911,540	2,549,486
Pennsylvania	6,462,652	313,603	705,868	7,482,123	6,818,470
Puerto Rico	1,586,699	78,853	224,046	1,889,598	1,088,619
Rhode Island	462,285	20,386	62,789	545,460	555,163
South Carolina	1,339,961	59,219	255,641	1,654,821	1,753,409
South Dakota	160,944	5,124	125,385	291,453	333,881
Tennessee	1,586,579	70,680	331,584	1,988,843	2,162,310
Texas	5,198,921	223,386	1,277,588	6,699,895	6,306,769
Utah	525,266	19,083	214,845	759,194	1,639,737
Vermont	273,325	11,774	58,737	343,836	393,419
Virgin Islands	30,508	975	35,455	66,938	42,044
Virginia	1,605,801	60,835	389,282	2,055,918	2,097,982
Washington	2,739,750	121,170	383,228	3,244,148	4,605,508
West Virginia	562,209	25,405	143,515	731,129	874,601
Wisconsin	2,800,535	135,077	337,421	3,273,033	4,041,989
Wyoming	158,312	5,526	97,280	261,118	289,275
Guam	0	0	8,423	8,423	0

(1) Above base postage is estimated based on FY 2007 President's budget assumptions. Above base weeks claimed were assumed to be realized in the same proportion as base weeks claimed.
(2) Does not include $2.0 million for FLC, WIG, and WOTC.
(3) Adjusted for amount paid by VETS

Attachment IV

3-Year Analysis – Average UI Work Load/Postage Costs

	Subject Employers X 4	Base & Above Weeks Claimed	Total Work Items	Actual UI Postage Paid (1)	Postage/Workload Index (PWI)I
Total	27,937,323	163,965,394	191,902,717	122,507,213	0.64
Alaska	66,344	896,399	962,743	386,426	0.40
California	4,055,272	25,197,132	29,252,404	13,677,523	0.47
Delaware	104,815	498,475	603,290	284,008	0.47
Illinois	1,121,289	8,699,369	9,820,659	4,680,539	0.48
Georgia	801,260	3,204,815	4,006,075	1,949,075	0.49
New Jersey	1,134,029	6,902,186	8,036,215	4,063,996	0.51
Kentucky	355,167	1,851,924	2,207,091	1,122,794	0.51
Rhode Island	133,544	761,399	894,943	472,163	0.53
Iowa	275,477	1,446,363	1,721,840	908,708	0.53
Idaho	163,055	828,806	991,861	564,342	0.57
Arizona	442,264	2,004,173	2,446,437	1,417,469	0.58
Texas	1,584,640	8,585,585	10,170,225	5,979,737	0.59
Nevada	195,141	1,198,353	1,393,494	831,233	0.60
Montana	126,761	444,473	571,234	344,338	0.60
Florida	1,665,620	5,506,664	7,172,284	4,335,134	0.60
New Mexico	169,788	713,244	883,032	534,118	0.60
Pennsylvania	1,084,319	10,318,167	11,402,485	6,987,478	0.61
North Dakota	74,633	204,399	279,032	171,851	0.62
New York	1,903,211	11,656,664	13,559,875	8,376,578	0.62
Alabama	345,828	1,715,347	2,061,175	1,291,814	0.63
New Hampshire	156,955	411,340	568,294	356,807	0.63
Louisiana	381,189	1,859,379	2,240,568	1,436,977	0.64
North Carolina	722,699	4,900,338	5,623,037	3,613,846	0.64
Minnesota	532,800	2,896,577	3,429,377	2,207,943	0.64
South Carolina	359,837	2,237,927	2,597,764	1,752,000	0.67
Michigan	859,713	7,777,429	8,637,142	5,924,568	0.69
Virginia	676,448	2,282,042	2,958,490	2,031,124	0.69
Oklahoma	301,555	1,198,496	1,500,051	1,031,974	0.69
Nebraska	181,493	731,274	912,767	631,153	0.69
Indiana	502,599	3,067,829	3,570,428	2,484,234	0.70
Missouri	522,380	3,260,932	3,783,312	2,651,006	0.70
Kansas	271,271	1,412,751	1,684,022	1,181,975	0.70
Tennessee	440,405	2,661,377	3,101,783	2,272,728	0.73
Massachusetts	700,909	5,308,642	6,009,551	4,436,854	0.74
Wyoming	78,417	196,996	275,414	204,528	0.74
Mississippi	216,189	1,192,701	1,408,891	1,046,631	0.74
Connecticut	387,411	2,572,449	2,959,860	2,262,254	0.76
Ohio	933,657	6,070,788	7,004,445	5,448,172	0.78
South Dakota	92,076	175,152	267,228	211,225	0.79
Arkansas	244,389	1,661,437	1,905,826	1,514,284	0.79

Maryland	538,829	2,104,189	2,643,018	2,121,206	0.80
Oregon	405,551	3,348,382	3,753,933	3,111,122	0.83
Hawaii	116,061	470,067	586,129	496,920	0.85
Maine	158,467	619,716	778,183	670,312	0.86
Vermont	84,161	403,675	487,837	420,219	0.86
Colorado	577,085	1,811,146	2,388,231	2,079,934	0.87
West Virginia	150,915	829,332	980,247	909,869	0.93
Wisconsin	492,273	4,290,065	4,782,338	4,449,888	0.93
Washington	822,569	4,791,216	5,613,786	5,452,896	0.97
Utah	226,560	787,811	1,014,371	1,715,240	1.69

Note: DC, PR and VI not included due to incomplete data
(1) Does not include WP, VETS, Trade or BLS postage paid