



EDMUND G. BROWN JR. GOVERNOR

September 30, 2015

COUNTY FISCAL LETTER (CFL) NO. 15/16-23

TO: ALL COUNTY WELFARE DIRECTORS ALL COUNTY FISCAL OFFICERS ALL COUNTY AUDITOR CONTROLLERS ALL COUNTY PROBATION OFFICERS ALL TITLE IV-E AGREEMENT TRIBES ALL COUNTY ELECTRONIC BENEFIT TRANSFER PROJECT MANAGERS

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY **DEPARTMENT OF SOCIAL SERVICES** 744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov

SUBJECT: COUNTY WELFARE DEPARTMENT (CWD) COUNTY EXPENSE CLAIM (CEC) TIME STUDY AND CLAIMING INSTRUCTIONS FOR THE DECEMBER 2015 QUARTER

This CFL provides counties time study and claiming instructions for the October through December 2015 quarter, which includes information and reminders regarding the following functions/programs:

Functions/Programs	Time Study Instructions	Claiming Instructions	General Information	Page Number
Social Services A. <u>Statewide Automated</u> <u>Child Welfare Information</u> <u>System (SACWIS)</u> <u>Maintenance and</u> <u>Operations (M&O)</u>	No	Yes	Yes	3
Social Services B. <u>Adoptions Title IV-E</u> <u>Discount Rate</u>	No	No	Yes	4
Social Services C. <u>Adoptions Assistance</u> <u>Program (AAP) De-Link</u> <u>Savings</u>	No	No	Yes	4

Functions/Programs	Time Study Instructions	Claiming Instructions	General Information	Page Number
Social Services D. <u>Commercially Sexually</u> <u>Exploited Children</u> (CSEC)	No	No	Yes	4
Social Services E. <u>California Well-Being</u> <u>Project</u>	No	No	Yes	5
California Opportunity and Responsibility to Kids (CalWORKs) A. Expanded Subsidized Employment (ESE)	No	Yes	Yes	5
Other Public Welfare (OPW) A. Fresno Employment and Training Pilot	No	Yes	Yes	7
Other Public Welfare (OPW) B. <u>Electronic Benefit</u> <u>Transfer (EBT)</u>	No	Yes	Yes	7
Other Public Welfare (OPW) C. <u>Cash Assistance Program</u> for Immigrants (CAPI)	No	Yes	Yes	8
Other Public Welfare (OPW) D. <u>Refugee Cash</u> <u>Assistance / Entrant</u> <u>Cash Assistance</u> (RCA/ECA)	No	Yes	Yes	9
Other Public Welfare (OPW) E. <u>Get Fresh</u>	No	No	Yes	9
Child Care	No	No	No	10
Non-Welfare	No	No	No	10
General A. <u>Type of Expense (TOE)</u> <u>Code 25 Issuance</u>	No	Yes	Yes	10

Functions/Programs	Time Study Instructions	Claiming Instructions	General Information	Page Number
General B. <u>Electronic Data</u> <u>Processing (EDP)</u> <u>Methodology Changes</u> <u>(SACWIS and Non-</u> <u>SACWIS)</u>	No	No	Yes	10
General C. Indirect Cost Rates	No	No	Yes	12
General D. <u>County Cash Claiming –</u> <u>Reporting</u>	No	No	Yes	12
General E. <u>California Department</u> <u>Social Services (CDSS)</u> <u>Policy Regarding Late</u> <u>County Expense Claim</u> <u>Submissions</u>	No	No	Yes	13
General F. <u>Debarment and</u> <u>Suspension</u>	No	No	Yes	13
General G. <u>Federal Fund Monitoring</u> <u>Responsibilities</u>	No	No	Yes	14

The Program Code Descriptions (PCDs) and Support Staff Time Reporting (SSTR) instructions for county use during the October through December 2015 quarter are as follows:

Section	Revised Quarter
Social Services	12/15
CalWORKs	09/15
Other Public Welfare	12/15
Child Care	09/15
Non-Welfare	09/05
Staff Development	09/07
Electronic Data Processing	03/01
Support Staff Time Reporting Instructions	06/06
Direct-to-Program (DTP)/Function Support Staff Codes	12/15
Direct Service Delivery (DSD) Codes	09/14
General Time Study Instructions	03/09
Type of Expense Code (TOE) Descriptions	12/15

For the latest version of the PCD manual, please go to the following link: <u>County</u> <u>Fiscal Letters</u>.

Please note that any changes to the PCDs and/or SSTR instructions may be shown in bold for addition of new language and strikeout for deletion of language.

I. Social Services

A. SACWIS Maintenance and Operations (M&O) clarifies System Support Staff (SSS)

As a condition of eligibility for SACWIS funding, the state is required to report, monitor and account for all county SACWIS expenditures under <u>45 Code of</u> <u>Federal Regulations (CFR) § 95.601</u>. This includes the ongoing M&O of the Child Welfare Services/Case Management System (CWS/CMS). The Administration for Children and Families (ACF) has approved the CWS/CMS activities for which associated costs may be claimed to receive SACWIS federal funding. These activities include CWS/CMS SSS activities. Additional information and claiming instructions are provided in <u>CFL No. 15/16-16</u> dated August 27, 2015.

B. Adoptions Title IV-E Discount Rate

Effective with the December 2015 Quarter, counties are required to submit a template for the Title IV-E Adoptions Non-federal Discount Rate calculation along with their CEC that provides adjustments to the caseload. This template will be used to reconcile the adjustments for county records and audit trail purposes. More information on the Title IV-E Adoptions Discount Rate is outlined on <u>CFL No. 15/16-08</u> dated August 6, 2015.

C. AAP De-Link Savings

The <u>CFL 14/15-63</u> dated May 21, 2015, instructed counties to report savings from the AAP de-link. An erratum was necessary to make a clear distinction between reporting requirements for Fiscal Year (FY) 2013-14 and FY 2014-15. The House of Representatives (H.R.) 4980 Section 206 reporting requirements took effect in FY 2014-15. As a result, the CFL 14/15-63E removes the spending requirement language from Attachment III (the reporting form from CFL No. 14/15-63). Information regarding the spending requirements for FY 2014-15 will be released in a forthcoming CFL. For more information regarding the AAP de-link savings, please refer to the <u>CFL 14/15-63E</u> dated August 6, 2015.

D. CSEC

Recent legislation (SB 855, Chapter 29, Statutes of 2014) amended the Welfare and Institution Code (W&IC) section 300 to clarify that, under existing law, the CSEC population whose parents or guardians failed or were unable to protect them may fall within the description of W&IC section 300(b) and be adjudged as dependents of the juvenile court. The Legislature also amended the W&IC (commencing with <u>Section 16524.6</u>) to establish a state-funded county CSEC Program to be administered by CDSS for which counties may elect to participate. In order to access funding for FY 2015-16 under the CSEC Program, counties are required to submit a county plan to CDSS. The counties who do not submit a county plan are not eligible for CSEC funds under this program.

Additional information and claiming instructions for the FY 2015-16 CSEC Program is forthcoming.

E. California Well-Being Project

The <u>CFL No. 15/16-02</u> dated August 28, 2015, supersedes CFL No. 14/15-22, dated October 1, 2014, and provides Project counties with updated claiming instructions and PCs for use in the Title IV-E Waiver.

The <u>CFL No. 15/16-10</u> dated September 2, 2015, provides Project counties with answers to frequently asked questions regarding the Title IV-E Waiver.

II. CalWORKs

A. Expanded Subsidized Employment (ESE)

The ESE program is a component of the 24-Month Early Engagement Redesign strategies implemented through Assembly Bill (AB) 74 (Chapter 21, Statutes of 2013) and described in <u>ACL No.13-81</u> dated September 30, 2013. Previously, <u>CFL No. 13/14-22</u> dated September 30, 2013, established ESE Administrative and Non-Administrative codes for both the Federal and non-Federal populations. Effective with the December 2015 quarter, the work subsidy Program Identification Numbers (PINs) 372098 – ESE ADM/SVC FED (A 9/13) and PIN 376098 – ESE ADM/SVC NON-FED (A 9/13) will be removed from the ESE Administrative program codes, as work subsidies provided to clients can be captured in ESE non-Administrative PC 374 - ESE NON-ADMIN FED (A 9/13) and PC 378 – ESE NON-ADMIN NON-FED (A 9/13).

Time Study Instructions

No Changes.

Claiming Instructions

Counties may continue to claim administrative and direct costs for the ESE Program using the updated PCs and PINs below or to the CalWORKs Single Allocation using PC 451 – Welfare-to-Work (WTW) Non-Federal or PC 633 – WTW General as previously instructed in CFL 13/14-22. The following are available effective the December 2015 quarter.

PC	372	ESE Admin Fed
TSC	3721	ESE Administration Federal
PIN	372070	Contractor Admin
PIN	372088-91*	Support/Operating
PIN	372094	Startup/Non-recurring Costs
PIN	372098	Work Subsidy
DTP	B2	ESE Federal

Costs for PC 372 are funded at 100/00/00 (Federal/State/Health/County).

PC	374	ESE Non-Admin Fed
TSC	3741	ESE Non-Administration Federal
PIN	374071	Contractor Non-Admin
PIN	374088-91*	Support/Operating
PIN	374094	Startup/Non-recurring Costs
PIN	374098	Work Subsidy
DTP	B2	ESE Federal

Costs for PC 374 are funded at 100/00/00 (Federal/State/Health/County).

PC	376	ESE Admin Non-Fed
TSC	3761	ESE Administration Non-Federal
PIN	376070	Contractor Admin
PIN	376088-91*	Support/Operating
PIN	376094	Startup/Non-recurring Costs
PIN	376098	Work Subsidy
DTP	B3	ESE Non-Federal

Costs for PC 376 are funded at 00/100/00/00 (Federal/State/Health/County).

PC	378	ESE Non-Admin Non-Fed
TSC	3781	ESE Non-Administration Non-Federal
PIN	378071	Contractor Non-Admin
PIN	378088-91*	Support/Operating

PC	378	ESE Non-Admin Non-Fed
PIN	378094	Startup/Non-recurring Costs
PIN	378098	Work Subsidy
DTP	B3	ESE Non-Federal

Costs for PC 378 are funded at 00/100/00/00 (Federal/State/Health/County). *The County must have a Letter of Intent on file with CDSS to use Support/Operating PIN Codes 88-91.

III. Other Public Welfare

A. Fresno Employment and Training Pilot

A recent Food and Nutrition Service grant was awarded to Fresno County for the implementation of a pilot program which would gauge program improvement associated with expanded employment and training services provided to Employment and Training (E&T) clients.

Claiming Instructions

As requested, retroactive to the June 2015 quarter, the following DTP code and PINs will be established to capture costs associated with the Fresno Employment and Training Pilot program.

PC	930	Fresno E&T Pilot
PIN	930031	Contracted Activities – Unemployed
PIN	930032	Contracted Activities – Employed
PIN	930068	Direct Costs – Unemployed
PIN	930088*	Operating Cost – Travel
PIN	930089*	Operating Cost – Space (Non-CCAP)
PIN	930090*	Operating Cost – Other Operating
PIN	930091*	Operating Cost – POS (Non-CCAP)
PIN	930094	Start Up/Nonrecurring Costs
DTP	C64	Fresno E&T Pilot

Costs will be funded 100/00/00/00 (Federal/State/Health/County). *The county must have a letter of intent on file with CDSS to use Support/Operating PIN codes 88-91. Costs claimed in excess of the county's allocation will be shifted to county-only share using SUO code 931.

B. EBT Issuance

Time Study Instructions

The time study instructions for PC 211- EBT Issuance have been revised to capture the EBT costs of the Cash Assistance Program for Immigrants and

Refugee Cash Assistance/Entrant Cash Assistance programs in addition to CalFresh, CalWORKs and county only General Relief.

CODE 2111 EBT Issuance

Costs associated with issuance include but are not limited to: card embossing, host to host benefits, issuance of Personal Identification Numbers (PINs) and providing replacement authorization documents. For costs associated with issuance of EBT cards that include CalFresh, CalWORKs, General Relief (GR), Cash Assistance for Immigrants (CAPI) and/or Refugee Cash Assistance/Entrant Cash Assistance (RCA/ECA), counties shall calculate a ratio based on their caseload in the EBT system, during one month of the quarter. Using the calculated ratio, redistribute and charge each program as if a check were being issued. The exception is CalFresh, since the correct code to charge is PC 211. The CalWORKs costs should be claimed to PC 614-CalWORKs Eligibility. The GR costs should be county only costs and claimed to PC 352-Other County Only Program [OCOP]/General Relief [GR]. The CAPI share of EBT costs should be claimed to PC 308-Cash Assistance Program for Immigrants. The RCA/ECA share of EBT costs should be claimed to PC 351-Refugee Cash Assistance/Entrant Cash Assistance program.

Claiming Instructions

No Changes.

C. CAPI

The CAPI was established in <u>CFL No. 98/99-18</u> dated September 25, 1998. The CAPI is a 100 percent state-funded program designed to provide monthly cash benefits to aged, blind and disabled non-citizens who are ineligible for Supplemental Security Income/State Supplementary Payment (SSI/SSP) solely due to their immigrant status. The CAPI cash benefits are currently issued through EBT cards and have a share of the EBT issuance costs claimed to PC 211.

Time Study Instructions

No Changes.

Claiming Instructions

Effective with the December 2015 quarter, **TOE code 25** has been added to PC 308 – CASH ASST/IMMIGRANTS (CAPI) (A 12/98). Counties must calculate the CAPI share of costs for EBT Issuance activities initially claimed to PC 211 and shift the CAPI share to PIN 308025. The shift must be done in accordance with instructions for Time Study Code (TSC) 2111.

PC	308	САРІ
PIN	308025	Issuance

D. Refugee Cash Assistance/Entrant Cash Assistance (RCA/ECA) Program

The RCA/ECA program provides eight months of cash assistance to needy refugees without children who are not eligible for any other cash aid. The CFL No. 97/98-40 dated December 18, 1997, established PC 351 – RCA/ECA PROGRAM (A 3/98). The RCA cash benefits are currently issued through EBT cards and have a share of the EBT issuance costs claimed to PC 211.

Time Study Instructions

No Changes.

Claiming Instructions

Effective with the December 2015 quarter, **TOE 25** has been added to PC 351. Counties must calculate the RCA share of costs for EBT Issuance activities from PC 211 and shift it to PIN 351025, in accordance with the PCD instructions for TSC 2111.

PC	351	RCA/ECA
PIN	351025	Issuance

E. Get Fresh

There are eight counties who are participating in the Get Fresh Program for Federal Fiscal Year 2016 (October 1, 2015 to September 30, 2016). The following counties have access to the Get Fresh claiming codes distributed in <u>CFL No. 13/14-17</u> dated September 19, 2013: El Dorado, Lake, Placer, San Francisco, San Joaquin, Santa Cruz, Shasta and Tehama. Counties discontinuing participation in the Get Fresh program as of September 30, 2015, may continue to utilize the existing claiming codes

through the December 2015 quarter for closing costs.

IV. Child Care

No Changes.

V. Non Welfare

No changes.

VI. General

A. Type of Expense (TOE) Code 25 Issuance

Claiming Instructions

Effective with the December 2015 quarter, the TOE code 25 description has been updated to reflect current practices.

TOE Code	TOE Code Title	TOE Code Description
<u>25</u>	<u>Issuance</u>	 Salary and benefits of staff issuing food stamps-EBT benefits, including but not limited to: Postage and the time it takes to mail food stamps. Cost of the rental or purchase of burglar-alarm/separate bank vault for the food stamp storage. Costs associated with EBT Issuance.

B. Electronic Data Processing (EDP) Methodology Changes, CWS/CMS SACWIS and Non-CWS/CMS (Non-SACWIS)

The following cost allocation methodology for CWS/CMS is to be effective retroactive to the September 2015 quarter. Counties must use the instructions and information outlined in <u>CFL No. 06/07-36</u> dated May 21, 2007. Please refer to <u>CFL No. 13/14-51</u> dated May 20, 2014, <u>CFL No. 13/14-51E</u> dated September 5, 2014 and <u>CFL No. 14/15-53</u> dated March 25, 2015, for current instructions. This CFL reminds CWDs of the proper CWS/CMS SACWIS claiming policies and procedures necessary for claiming and allocating Automated Data Processing activities and expenditures appropriately to the CWS/CMS SACWIS and non-SACWIS categories in accordance with federal policy and guidelines.

Effective July 1, 2011, AB 118 (Chapter 40, Statutes of 2011) and ABX 116 (Chapter 13, Statutes of 2011) realigned CWS. The PC 135-SSI/SSP Out-Of-Home Care, PC 175-FPP - Services/Nonfederal, PC 588- Supportive Therapeutic Options Program (STOP) Assessment/Case Plan, PC 786- NREFM Under 18, PC 787-NREFM Over 18, PC 840- EFC Services Non-Federal, PC 863- Non-Related Legal Guardian NMD, PC 864- NRLG Probate Court and PC 865- NRLG Juvenile Court are subject to the realignment provisions of AB 118 per <u>CFL No. 11/12-18</u> dated September 16, 2011.

PC	Program Name	Percent	Program
536	SACWIS	.6740	Title IV-E/ IV-B
513	EA–ER	.1903	TANF
544	CWS MPI (AB 908)	.0053	TANF
556	CWS-MPS (AB 908)	.0013	TANF
144	CWS–Health Related	.1129	Title XIX
150	EPSDT	.0000	Title XIX
168	FPP–Health Related	.0005	Title XIX
838	EFC-Health Related	.0021	Title XIX
182	ILP-Case Management	.0031	Chafee
184	ILP–Services	.0031	Chafee
135	SSI/SSP OHC	.0001	State
175	FPP Services/Non-Fed	.0013	State
588	STOP–Assessment/Case Plan	.0002	State
165	Wraparound Services	.0011	County
786	NREFM Under 18	.0005	State
787	NREFM NRLG	.0010	State
840	EFC Services Non-Fed	.0006	State
863	NRLG NMD	.0008	State
864	NRLG Probate	.0007	State
865	NRLG Juvenile	.0009	State

*The following is the CWS/CMS allocation to benefiting programs:

*The updated CWS/CMS percentage allocation to benefiting programs is forthcoming.

C. Indirect Cost Rates (ICRs)

The CDSS has developed ICRs for use by counties during FY 2015-16 in the enclosed Attachment entitled FY 2015-16 INDIRECT COST RATE (ICR). The ICRs are used to identify overhead costs associated with support staff that performs activities for non-welfare programs with no equivalent casework hours. The CDSS' Financial Analysis Bureau develops ICRs based on actual indirect cost (i.e., Travel, Space, Space - County Cost Allocation Plan (CCAP), Other Operating Costs, Public Agencies CCAP and Public/Private Agencies Direct Billed) that were reported as generic by each county for the four guarters of FY 2013-14. The totals are divided by the total direct salary and benefit costs (caseworker, administrative/clerical support and EDP staff salaries and benefits). The resulting percentages are each county's individual ICR. The CWDs have the option of either using the predetermined ICR developed by CDSS or developing an ICR specific to allocable support staff. An ICR developed by a CWD must be developed in accordance with "A Guide for State, Local and Indian Tribal Government-Cost Principles and Procedures for Developing Cost Allocation Plans and Indirect Cost Rates for Agreements with the Federal Government" (OMB CFR § 200.416). The ICRs are applied to the salaries and benefits of support staff performing activities for non-welfare programs only. The salaries and benefits plus overhead are reported as Direct Costs on the CEC using PIN 805068 (Non-welfare Programs) or PIN 806068 (Non-welfare Programs-Non EDP). Counties are reminded that Non-welfare activities must be reported in the Non-welfare function, which will draw down associated overhead through the CEC based on the time study hours of caseworkers performing the Non-welfare activity.

D. County Cash Claiming–Reporting

As a reminder, costs must be claimed in accordance with cash claiming requirements set forth in <u>CFL No. 06/07-06</u> dated July 13, 2006. In accordance with federal regulations at <u>45 CFR § 95.13</u> the CEC is a cash claim and costs should be claimed according to the date the payment is made. The requirement to claim costs on a cash basis through the CEC does not remove a county's responsibility to comply with Generally Accepted Accounting Principles for county financial statements that are used for purposes other than CEC claiming. Adjustment claims must be submitted in a timely manner to ensure that the two-year limit for claiming federal funds is met. Adjustment claims should include corrections to the Original quarter submission. They should not include corrections for any other quarters. Due dates for these claims are provided annually in advance within every March quarterly CFL. Furthermore, counties are to maintain supporting documentation for all claims.

E. California Department Social Services Policy Regarding Late County Expense Claim Submissions

Due to recent policy enforcement by the federal ACF, CDSS needs to report CEC data within 45 days after the quarter ends (<u>TANF-ACF-PI-2014-02</u>). The ACF Washington D.C. Headquarters requires this information for nationwide budgeting and distribution of their federal funds. As a result, CDSS is unable to accept late CECs without jeopardizing federal funding for California. This information was previously shared at the County Welfare Directors Association Fiscal Committee meeting.

As a result, any county requests for extensions must be received by CDSS at least two weeks before the due date and will need to be requested in writing from the County Welfare Director. Requests for extension should be sent to:

California Department of Social Services County Systems Section Attn: Racquel Flanagan, Manager 744 P Street, MS 9-5-03 Sacramento, CA 95814

F. Debarment and Suspension

Pursuant to federal regulations, CWDs must be in good standing with the federal government to receive federal funds. To ensure that CWDs are not debarred or suspended from federal financial assistance programs by any federal department or agency, CDSS must verify that the CWD is not listed on the federal Excluded Parties Listing System prior to issuance of any federal funds.

To ensure accuracy of the verification, CDSS requires submissions of the CWD's exact legal name of the entity and Employer Identification Number (EIN) or Tax Identification Number (TIN) as submitted to the Internal Revenue Service when applying for an EIN or a TIN. If a CWD is operating under multiple names or identification numbers, each name and identification number must be submitted. The information requested must be submitted via email on or before July 1, 2016, to CDSS at <u>Fiscal.Systems@dss.ca.gov</u> with "EIN or TIN for the County of (*insert county name*)" in the subject line. Counties should review the federal fund monitoring responsibilities for counties outlined in <u>CFL No. 14/15-77</u> dated June 26, 2015, and further described in Section G of this CFL.

G. Federal Fund Monitoring Responsibilities

As a reminder, counties have certain responsibilities for monitoring the expenditures of federal funds. Please refer to <u>CFL No. 14/15-77</u> dated June 26, 2015, for a description of federal requirements and a link to the terms and conditions for each federal grant administered by <u>CDSS</u>. Additionally, new terms and conditions will be posted to this link on an ongoing basis.

If counties have any questions regarding this CFL, please direct them to the Fiscal Systems Bureau at <u>Fiscal.Systems@dss.ca.gov</u>.

Sincerely,

Original Document Signed By:

DIANNE OKAMOTO, Chief Fiscal Systems and Accounting Branch Attachment

C: CWDA

FY 2015-16 INDIRECT COST RATE (ICR) Data from FY 2013-14 County Expense Claims

COUNTIES	ICR
ALAMEDA	0.19
ALAMEDA	0.19
AMADOR	0.32
BUTTE	0.32
CALAVERAS	0.27
COLUSA	0.54
CONTRA COSTA	0.37
DEL NORTE	0.28
EL DORADO	0.33
FRESNO	0.15
GLENN	0.19
HUMBOLDT	0.24
IMPERIAL	0.25
INYO	0.30
KERN	0.15
KINGS	0.19
LAKE	0.26
LASSEN	0.39
LOS ANGELES DPS	0.20
MADERA	0.28
MARIN	0.36
MARIPOSA	0.49
MENDOCINO	0.21
MERCED	0.13
MODOC	0.33
MONO	0.47
MONTEREY	0.19
NAPA	0.29
NEVADA	0.51
ORANGE	0.22
PLACER	0.57
PLUMAS	0.24
RIVERSIDE	0.12
SACRAMENTO-DHA	0.20
SAN BENITO	0.36
SAN BERNARDINO	0.20
SAN DIEGO	0.24
SAN FRANCISCO	0.22
SAN JOAQUIN	0.14
SAN LUIS OBISPO	0.18
SAN MATEO	0.28
SANTA BARBARA	0.15
SANTA CLARA	0.22
SANTA CRUZ	0.24
SHASTA	0.28
SIERRA	0.26
SISKIYOU	0.21
SOLANO	0.21
SONOMA	0.17
STANISLAUS	0.16
SUTTER	0.14
TEHAMA	0.14
	0.25
TULARE	0.30
	0.23
VENTURA	0.25
YOLO	0.20
	0.22
LOS ANGELES DCS	0.18
SAC-DHHS-CHILD SAC-DHHS-ADULT	0.35
	0.25
SMATEO DP AGING PLACER-ASOC	0.18
STATEWIDE	0.45
STATEWIDE	0.21