

North Carolina Board of Barber Examiners Fiscal Analysis of Proposed Rule Mandatory Online Renewals

Rule information

Below is information about the proposed rule, including citation, authority, and statements of the rule impact.

Citation and authority

Rule citation21 NCAC 06N .0101 (see Appendix 1)
Authorizing statutes.....G.S. 86A-5; 86A-13; 86A-17; 86A-23; 86A-24;
86A-25; 86A-27(d); 93B-2; 150B-19.1

Statements of the rule impact

State government..... Yes
Local government..... Yes
Private sector Yes
Substantial impact.....No

Contact information

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Problem

The North Carolina Board of Barber Examiners (“board”) has limited staff to renew thousands of licenses and process payments. As a result, during peak renewal periods, there are substantial delays in issuing licenses. Some of the negative consequences of these delays are listed below.

- Members of the public may not be aware that the individual or business has made a timely renewal and is properly licensed;
- The board staff has to delay enforcement for businesses and certain individuals that fail to renew on time until all the mailed renewals have been processed;¹
- Individuals who need licenses quickly may not be able to work until the licenses are issued. For example, if an individual wishes to work at a military base, he or she may need to have a copy of the license in order to work. But if the board has not processed the renewal, the individual may not have the necessary documentation to demonstrate compliance.
- The licensees' perception of the board's responsiveness and customer service is negatively affected by these delays;
- Other licenses that need to be issued around the peak renewal time are delayed, and that may affect individuals' ability to work. For example, an individual who passed the licensing exam in May and sent payment at the end of May for an initial license will experience delays that may prevent him or her from working while the staff works through the rest of the mailed payments received at that time.

Receiving a large number of mailed license renewals has negative consequences for accounting and financial controls. First, with so few staff members, mailed payments represent a risk for the board because the board's ability to establish thorough internal controls for every aspect of payment handling is circumscribed. Second, the annual audit and preparation of financial statements (required under G.S. Chapter 93B) is made more complicated by a large number of mailed payments. Since the board is required to deposit funds promptly and report on the deposits as required by G.S. § 147-77 (a statutory requirement that alone is challenging to comply with at the height of the renewal period), the board has to temporarily report in NCAS any funds received under a generic revenue account until the staff can process the renewal and determine the appropriate revenue budget account. The renewal deadline occurs near the end of the fiscal year, and in previous years, there have been a large number of unprocessed renewals that appeared in the generic revenue account at the end of the fiscal year. For the annual audit and preparation of financial statements, the board staff was required to spend time preparing an analysis for the independent audit firm to show how the funds in the generic revenue account were eventually distributed when they were processed in the following fiscal year.

¹ This issue applies to licenses for barbershops, barber schools, apprentice barbers, and barber instructors. It does not apply to licenses for registered barbers, which represent the largest segment of our license population, because G.S. § 86A-17 prohibits the staff from issuing civil penalties until at least six months after the license expires.

Solution

The board has authorized a rule that would require licensees to renew online. This option would eliminate the vast majority of our mailed payments—thereby improving internal controls—and allow the staff to issue licenses quicker.

The board has considered alternative solutions, the most viable of which would be to pay for additional resources in the form of more staff or temporary services. However, given the board's current financial position, this alternative may not be feasible, nor would it fully address the risk of receiving mailed payments. The board has also determined that the proposed rule would have a positive statewide economic impact.

Background

The relevant licenses or permits include the following, with the total population with current licenses as of March 1, 2017:

- Registered barber (6,288)
- Apprentice barber (746)
- Barber instructor (210)
- Barber shop (2,476)
- Barber school (35)

Under various statutes, the license types listed above must be renewed between January 1 and May 31 each year.² Among other consequences, failure to renew by May 31 requires payment of a late fee, in addition to the permit or license fee. Statutory caps for fees are established in G.S. § 86A-25. The relevant fees are set in one of the board's rules, 21 NCAC 06N. 0101(a).

The board created an online renewal system for licensees as an optional method to renew a license, and this system was deployed in January 2016. Licensees still have the option of making payment in person or by mail. The existing online renewal system is sufficient to handle all licensees, so implementing the rule would not require additional costs for system capacity.

The board's fiscal year runs from July 1 to June 30.

Burden to applicants

As a threshold issue, the board considered whether mandatory online renewals would create a burden to licensees, whether economic or otherwise. The board looked at comparable professions that have mandatory license renewals. For example, the Board

² The relevant statutes are: G.S. § 86A-13 for barber shops and barber school permits; G.S. § 86A-17 for registered barbers; G.S. § 86A-23 for barber instructors; and G.S. 86A-24 for apprentice barbers

of Cosmetic Arts Examiners indicated that 94% of its licensees renew online, even though that board doesn't mandate online renewals. Based on this research, the board determined that mandatory online renewals would pose a substantial burden to very few licensees.

For those few licensees who would face a substantial burden by renewing online, the board included a provision in the proposed rule for a waiver. The board believes that few people will request waivers because, as indicated above, similar license populations have a high rate of voluntary online renewals. Nonetheless, the attached spreadsheet has a sensitivity analysis that reflects various possibilities for the number of waiver requests. The board also has exempted the 35 barber schools from the requirement to use the online system for renewals, although they may choose to renew online. The same sensitivity analysis for waivers would also account for the impact of some schools not using the online system.

Anticipated factors affecting costs and benefits

The spreadsheet attached to this summary outlines the expected costs and benefits to affected parties for this rule. The descriptions below offer more detail so that it's clear what the costs and benefits involve. The descriptions also explain why certain factors haven't been included in the analysis.

Transaction fees

The board absorbs the cost of transaction fees, which include fees by the card-payment processor and the bankcard companies (Visa, MasterCard, and Discover).

In 2016, there were 2,447 approved transactions, with the breakdown of transaction amounts shown in the table below. These transactions amounted to \$124,860 in gross revenues.

Transaction amount	Transaction count
\$50.00	2,382
\$85.00	59
\$95.00	1
\$130.00	5
TOTAL	2,447

The board paid \$1,495.38 in transaction fees in 2016, or an average of \$0.61 per renewal. Assuming that transaction fees remain consistent, the total cost in transaction fees with mandatory online renewals would be \$5,950.55.³

³ Based on revenue data for fiscal years 2010-2016, the board expects the number of licensees to remain relatively consistent, although there may be some year-to-year variation.

The board also pays fees of about \$780 per year for the maintenance of a zero-balance account. This amount is included in the analysis because the zero-balance account is necessary for an online payment system to meet the requirements established by the Office of the State Controller and the Department of State Treasurer.

Licensing vendor costs

As mentioned under “Background” above, the system to accommodate online renewals is already in place. This existing system is sufficient to accommodate all licensees, so no additional vendor work will be necessary to deal with any increase in the number of transactions. Periodically, there may be tasks under the contract with the vendor to address issues or enhance performance. Since the board would be mandating online renewals, maintaining this system would be a requirement.

The quarterly annual contract cost is currently \$4,818.44, which can be increased annually according to the Consumer Price Index (CPI). The contract term is based on the state’s fiscal year, so increases may occur at the halfway point. The attached spreadsheet reflects CPI increases based on a 10-year annual average (2007-2017), but the average omits years where the CPI decreased.⁴

Under the terms of the contract, the board receives a certain amount of allocated work as part of the contract costs. These costs are not based on billable hours or specific projects but rather a part of the annual contract fee. The board estimates that 21% of the contract work (5 of 24 tasks) would be allotted to improvements toward the online system, so the attached spreadsheet shows 21% of the contract costs allocated toward maintenance and improvement of the online system.

Personnel costs

Currently, several steps must occur to process renewals that are mailed or hand-delivered, amounting to an estimated average of six hours each day. (Although we have an option to pay by credit card or debit card in person, these renewals currently represent a small portion of our renewals.) These steps include the following, with total average daily time estimates:

- Opening mail or receiving the in-person payment, which includes the following (150 minutes):
 - Recording the payment or marking the payment with a license number
 - Restrictively endorsing the payment
 - For checks, recording a license number in case the payment doesn’t clear
 - Copying each payment for later processing since we don’t have the staff to be able to process renewals immediately

⁴ The 10-year annual average comes from data provided by the United States Department of Labor Bureau of Labor Statistics. See https://data.bls.gov/timeseries/CUUR0000SA0?output_view=pct_12mths, accessed July 6, 2017. The data from that site is available in the table in Appendix 2.

- Logging a daily deposit, with at least two people verifying the deposit (25 minutes)
- Entering data to renew the license (135 minutes)
- Reconciling the deposit to the log of renewed licenses (10 minutes, accounting for instances when discrepancies must be researched and corrected)
- Printing and mailing licenses (60 minutes)

Of these steps, if online renewals were mandatory, the staff would only have to perform the last two steps. We would therefore have a significant decrease in personnel hours devoted to renewals—about 5.17 hours each day, or 25.83 hours per week—and these resources could be allocated elsewhere. The board’s work on license renewals generally spans January to August, or 35 weeks. The 904 total hours would be reduced by 30 hours for holidays (five holidays at six hours working on renewals each day). The estimated time per year spent on license renewals would be 874.17 hours.

However, as indicated below, the board uses temporary services. In 2016, the board had temporary personnel perform 659 hours. Since those services are accounted for separately, there would be about 215 permanent-staff hours that would be eliminated by this rule change.

The work that would be eliminated by this rule change is performed by two permanent staff members who make the equivalent of \$23.06 per hour, representing \$4,957.90 in wages. In addition, the board will pay about 35.9% in benefits, or about \$1,779.89.⁵ The total for wages and benefits would be \$6,737.79. In fiscal year 2016, about 22% of timely licenses were renewed online. Therefore, about \$5,255.48 in wages would be directed to other agency work.

Audit and reconciliation to trial balance

As mentioned above under “Problem,” the executive director and independent auditor have to verify the distribution of revenues that are in a generic revenue account at the end of the fiscal year but later are transferred to other revenue accounts. This analysis must be reconciled to the end-of-fiscal-year trial balance and cost about \$577.09 to prepare, as explained below.

- The executive director devotes about 6 hours to this analysis. The current executive director makes the equivalent of \$38.43 per hour, representing \$230.58 in wages. In addition, the board will pay about 35.9% in benefits, or about \$82.78. The total for wages and benefits would be \$313.36.
- The accounting firm that prepares the board’s financial statements spends about 3 hours of time verifying the analysis. In fiscal year 2017, the board paid \$9,670 for 110 hours of audit work, or about \$87.91 per hour. Therefore, the share of audit work devoted to this analysis was about \$263.73.

⁵ The 35.9% rate for benefits is the same rate OSBM uses for cost collection worksheets for civil penalties.

Temporary services

During the height of the renewal period, the board uses temporary services through the Office of State Human Resources to process renewals. As mentioned under “Personnel costs” above, much of the work involved with renewing licenses would be eliminated with mandatory online renewals. Therefore, the board would no longer use temporary services for license renewals.

In 2016, the board used temporary services almost exclusively for processing license renewals. (The additional uses for temporary services were negligible for the purposes of this analysis.) The board paid \$11,862 in fees for 659 hours of temporary services, which the board would save under the proposed rule change.

Offset of late fees

When individuals have the option of paying online, they are more likely to submit timely payments. As a result, any late fees will tend to decline. The table below shows the late fees the board collected by fiscal year according to the board’s financial statements.

Fiscal year	Total late fees collected
2016	\$71,715
2015	\$100,705
2014	\$77,985
2013	\$86,590
2012	\$94,175
Average	\$86,234

Unfortunately, the late fees vary significantly from fiscal year to fiscal year, partly because of how close the renewal deadline (May 31) is to the end of the fiscal year. However, the average gives an estimate of the annual revenue from late fees.

It’s difficult to provide a precise estimate—even using the average of late-fee revenues over several fiscal years—of how much the board will lose in late fees, in part because not everyone who has to pay late fees will be able to avoid them by renewing online. For example, when an individual is multiple years behind with a license, he or she may be able to catch up and restore the license simply by paying past-license fees and late fees. The board’s licensing software doesn’t currently provide a reliable method of extracting data to distinguish between late fees that will and won’t be affected by this rule change. Therefore, we assume for the purpose of this analysis that 40% of the average represents an estimated loss to the agency (and gain to the licensee) if this rule were to be approved. There is a sensitivity analysis included in the attached spreadsheet to reflect other percentages, given the uncertainty with the 40% estimate.

Civil penalties

The board assesses civil penalties for noncompliance with board regulations, including expired licenses. These civil penalties are remitted to the counties where the violations occurred through OSBM, apart from a percentage that OSBM authorizes the board keep as partial reimbursement. Currently, that reimbursement rate is 20%, the maximum allowed under law. The board has no reason to think this reimbursement rate will change. The board also is authorized to assess an attorney-fee tax, but that assessment is only a reimbursement of standard expenses of \$165.

We expect a decrease in (but not an elimination of) instances of unlicensed practice when renewals are mandated online. This decrease will reduce inflows of civil-penalty payments, thereby reducing revenues to counties. The table below shows the violation types that would be affected by mandatory online renewals, the number of violations in the past year, and the standard civil penalty. (There are additional violation types that would be affected, but we have not issued civil-penalty assessments for them in the past year.)

Violation type	Number in past year	Standard civil penalty
Operating a barber shop with an expired permit	26	\$150.00
Engaging in the practice of barbering with a license or permit that has expired or lapsed for more than a six-month duration ⁶	38	\$100.00
Allowing an individual to engage in the practice of barbering with a license or permit that has expired or lapsed for more than a six-month duration. ⁷	11	\$100.00

The table shows potential collections of \$8,800. However, for three reasons, that amount doesn't represent the total expected loss.

- First, the board has a relatively high rate of write-offs for civil penalties, particularly for these types of violations. Sometimes, barbers are unable to afford the civil penalty. (The board normally doesn't pursue action in court unless the civil penalties are at a level that make the enforcement worth the cost.)
- Second, there will continue to be unlicensed practice, even with this rule change.

⁶ Although the board currently processes all mailed renewals within six months, the board believes that if individuals are less likely to renew late, then they're also less likely to lose track of when they should renew and whether they've renewed each year.

⁷ See previous footnote.

- Third, as explained in footnotes 6 and 7, two of the violations are only indirectly affected by the rule.

The board doesn't have data that would allow it to reliably predict how much civil penalties will be reduced as a result of the proposed rule. Therefore, we can only guess at the impact and believe that the number is unquantifiable under the current tracking system. In order to incorporate the potential impact on civil penalties, the attached spreadsheet starts with the assumption that 40% of civil penalties will be affected, or \$3,520. (There is a sensitivity analysis to reflect the impact of other possible percentages.) The board's write-off rate is about 47%. Therefore, the collectible portion of assessments is \$1,865.60. Of that, \$1,492.48 would otherwise go to the counties, after discounting the board's 20% reimbursement withholding. The board's withholding would represent costs that could be directed to other areas of operations. The board collected \$12,375 in attorney fees, so the collectible portion of attorney fees would be \$2,623.50.

Mailings

The board will need to notify all licensees of the law change. The current plan is to provide two forms of notice to each licensee: a letter and a postcard. Based on historical costs for previous mailings, we estimate that there will be a one-time cost of about \$10,100 for a vendor to prepare the mailing, including printing, stuffing envelopes, and postage.

Conclusion

This section discusses the impact of the proposed rule on affected parties—state government, local government, and the private sector—and explains the impact of sensitivity analyses.

Impact on affected parties

Below is a summary of the impact on affected parties for the first three years. A full presentation is available in the attached spreadsheet.

(Continued on the next page)

Costs and benefits to parties affected				
Year	0	1	2	3
COSTS				
State government				
Transaction fees		\$5,951	\$5,951	\$5,951
Licensing vendor costs		\$4,088	\$4,129	\$4,170
Zero balance account		\$780	\$780	\$780
Loss of late fees		\$34,494	\$34,494	\$34,494
Civil penalties		\$373	\$373	\$373
Attorney fees		\$2,624	\$2,624	\$2,624
Mailing costs	\$10,100.00			
Local government				
Civil penalties		\$1,492	\$1,492	\$1,492
Total costs	\$10,100	\$49,801	\$49,842	\$49,883
Present value of costs	\$10,100	\$46,543	\$43,534	\$40,720
BENEFITS				
Private				
Civil penalties		\$1,866	\$1,866	\$1,866
Attorney fees		\$2,624	\$2,624	\$2,624
Late fees		\$34,494	\$34,494	\$34,494
State government				
Personnel costs		\$17,695	\$17,695	\$17,695
Total benefits	\$0	\$56,677	\$56,677	\$56,677
Present value of benefits	\$0	\$52,969	\$49,504	\$46,266
Net impact	(\$10,100)	\$6,876	\$6,835	\$6,794
Net impact, present value	(\$10,100)	\$6,426	\$5,970	\$5,546
NPV 5 years	\$12,993			
NPV 10 years	\$33,732			
NPV 20 years	\$57,847			
NPV 40 years	\$74,381			

State government

After implementing this rule, state government (in this case, the board) will have either expenditures or lost revenues that together exceed cost savings.⁸ The total costs will exceed benefits in Years 1 to 3 by an average of \$30,655. The bulk of this cost comes from lost late-fee revenues.

As discussed under “Private sector” below, many of the costs to state government are offset in the economic analysis by benefits to the private sector.

Local government

Counties that receive most of our civil penalty collections will lose some money. The board anticipates fewer instances of individuals or entities operating with an expired license, which in turn means fewer instances of civil penalties assessed for unlicensed

⁸ The intangible benefits of implementing this rule lie the way it addresses the problems identified earlier in this analysis, particularly for internal controls and processing times.

practice. The board expects local governments will experience a total loss of \$1,492 each year.

Private sector

This rule will not result in any cost to the private sector. There will be a benefit to licensees commensurate to the lost revenue from late fees, attorney fees, and civil penalties. The board anticipates annual benefits worth \$38,983 for the private sector.

Sensitivity analyses

Tables 3–5 in the attached spreadsheet offer sensitivity analyses for three areas of the economic analysis.

Number of waivers

The proposed rule would allow licensees who cannot renew online—for example, licensees who don't have computer or Internet access—to receive a waiver so they can renew by mail. It also exempts the relatively few number of barber schools from the requirement to use the online renewal system. We don't have data that would allow us to reliably predict how many licensees will renew by mail, so Table 3 (“Sensitivity analysis for number of waivers”) assesses the impact of the number of waivers (or number of schools that renew by mail) on transaction fees, the total amount of which is inversely proportional to the number of mailed payments. The table also reflects the cost impact of staff time for processing the waivers. Over a 40-year period, the effect would be \$6,710 decrease in the net benefit of the rule.

Late fees

As discussed above in “Offset of late fees,” the board expects fewer licensees to renew late once online renewals are mandatory. However, the estimate that 40% of late fees will be eliminated under the proposed rule change is uncertain. Therefore, Table 4 (“Sensitivity analysis for offset of late fees”) assesses the impact of various rates of decline in late fees. As the percentage increases, the offset is greater.

Since the loss of late-fee revenue for state government represents a gain for the private sector, there is no impact on net present value.

Civil penalties and attorney fees

As discussed above in “Civil penalties,” the board is not certain about the effect of the proposed rule on certain civil penalty collections. The analysis in the attached spreadsheet assumes that civil penalties will be reduced by 40%. Table 5 (“Sensitivity analysis for civil penalties and attorney fees”) assesses the impact of other rates.

Since the loss of civil penalties and attorney fees for government represents a gain for the private sector, there is no impact on net present value.

1 21 NCAC 06N .0101 is proposed for amendment as follows:

2

3 **21 NCAC 06N .0101 FEES, ACCESS TO FORMS, AND RENEWALS**

4 (a) The Board charges the following amounts for the fees authorized by G.S. 86A-25:

5	(1)	Certificate of registration or renewal as a barber	\$50.00
6	(2)	Certificate of registration or renewal as an apprentice barber	\$50.00
7	(3)	Barbershop permit or renewal	\$50.00
8	(4)	Examination to become a registered barber	\$85.00
9	(5)	Examination to become a registered apprentice barber	\$85.00
10	(6)	Late fee for restoration of an expired barber certificate within first year after expiration	\$35.00
11	(7)	Late fee for restoration of an expired barber certificate after first year after expiration but within five	
12		years after expiration	\$70.00
13	(8)	Late fee for restoration of an expired apprentice certificate within the first year after expiration	
14			\$35.00
15	(9)	Late fee for restoration of an expired apprentice certificate after first year after expiration but within	
16		three years of first issuance of the certificate	\$45.00
17	(10)	Late fee for restoration of an expired barber shop certificate	\$45.00
18	(11)	Examination to become a barber school instructor	\$165.00
19	(12)	Student permit	\$25.00
20	(13)	Issuance of any duplicate copy of a license, certificate, or permit	\$10.00
21	(14)	Barber school permit or renewal	\$130.00
22	(15)	Late fee for restoration of an expired barber school certificate	\$85.00
23	(16)	Barber school instructor certificate or renewal	\$85.00
24	(17)	Late fee for restoration of an expired barber school instructor certificate within first year after	
25		expiration	\$45.00
26	(18)	Late fee for restoration of an expired barber school instructor certificate after first year after	
27		expiration but within three years after expiration	\$85.00
28	(19)	Inspection of newly established barbershop	\$120.00
29	(20)	Inspection of newly established barber school	\$220.00
30	(21)	Issuance of a registered barber or apprentice certificate by certification	\$120.00
31	(22)	Charge for certified copies of public documents \$10.00 for first page, \$0.25 per page thereafter	
32	(23)	Charge for duplication services and material shall be as set forth in 26 NCAC 01 .0103(a), including	
33		any subsequent amendments and editions of the Rule	
34	(24)	Certificate of registration or renewal as a barber for barbers over 70 years of age	\$0.00
35	(25)	Administrative fee under G.S. 86A-27(d) for paying any required fee for renewal or restoration, or	
36		a civil penalty and attorney fee, where the apprentice barber or registered barber is subject to a pick-	
37		up order issued to an inspector.	\$70.00

1 (b) In the event the Board's authority to expend funds is suspended pursuant to G.S. 93B-2, the Board shall continue
2 to issue and renew licenses and all fees tendered shall be placed in the escrow account maintained by the Board for
3 this purpose.

4 (c) The forms set forth in this Subchapter may be obtained on the website or at the address listed in 21 NCAC 06A
5 .0102.

6 (d) All timely renewals of licenses, permits, or certificates of registration shall be submitted online at the website
7 listed in 21 NCAC 06A .0102, along with any fees required by this Rule.

8 (e) Barber school permits are exempt from the online renewal requirement in Paragraph (d) of this Rule.

9 (f) Registered barbers, apprentice barbers, barber instructors, or barber shops that are unable to comply with the online
10 requirement of Paragraph (d) of this Rule may submit the renewal and payment by mail or in person after receiving a
11 waiver from the Board. This waiver shall be effective only for one renewal period. The Board shall issue a waiver
12 within five business days after receiving the following:

13 (1) For registered barbers, apprentice barbers, or barber instructors, a notarized statement from the
14 holder of the license, permit, or certificate of registration that the barber is not able to renew online;

15 or

16 (2) For barber shops, a notarized statement from the manager or owner that neither the manager nor
17 owner are able to renew online.

18
19 *Authority G.S. 86A-5; 86A-13; 86A-17; 86A-23; 86A-24; 86A-25; 86A-27(d); 93B-2; 150B-19.1*

**CPI-All Urban Consumers (Current Series)
12-Month Percent Change**

Series Id: CUUR0000SA0
Not Seasonally Adjusted
Series Title: All items in U.S. city average, all urban
Area: U.S. city average
Item: All items
Base Period: 1982-84=100
Years: 2007 to 2017

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
2007	2.1	2.4	2.8	2.6	2.7	2.7	2.4	2.0	2.8	3.5	4.3	4.1	2.8	2.5	3.1
2008	4.3	4.0	4.0	3.9	4.2	5.0	5.6	5.4	4.9	3.7	1.1	0.1	3.8	4.2	3.4
2009	0.0	0.2	-0.4	-0.7	-1.3	-1.4	-2.1	-1.5	-1.3	-0.2	1.8	2.7	-0.4	-0.6	-0.1
2010	2.6	2.1	2.3	2.2	2.0	1.1	1.2	1.1	1.1	1.2	1.1	1.5	1.6	2.1	1.2
2011	1.6	2.1	2.7	3.2	3.6	3.6	3.6	3.8	3.9	3.5	3.4	3.0	3.2	2.8	3.5
2012	2.9	2.9	2.7	2.3	1.7	1.7	1.4	1.7	2.0	2.2	1.8	1.7	2.1	2.3	1.8
2013	1.6	2.0	1.5	1.1	1.4	1.8	2.0	1.5	1.2	1.0	1.2	1.5	1.5	1.5	1.4
2014	1.6	1.1	1.5	2.0	2.1	2.1	2.0	1.7	1.7	1.7	1.3	0.8	1.6	1.7	1.5
2015	-0.1	0.0	-0.1	-0.2	0.0	0.1	0.2	0.2	0.0	0.2	0.5	0.7	0.1	-0.1	0.3
2016	1.4	1.0	0.9	1.1	1.0	1.0	0.8	1.1	1.5	1.6	1.7	2.1	1.3	1.1	1.5
2017	2.5	2.7	2.4	2.2	1.9										

Ten-year average 1.8
Ten-year average w/o decrease years 2.0