

THOMAS M. SALMON, CPA, CFE
STATE AUDITOR



STATE OF VERMONT
OFFICE OF THE STATE AUDITOR

SITUATION REPORT:
Department of Public Safety

Controlling overtime still a challenge for State Police.

March 2012

Situation Report

State Police Overtime

March 2012

A situation report is not an audit. It is an effective tool to inform citizens and management of issues in order to foster forward progress. It expresses no opinion nor draws conclusions. Instead the report gathers information in order to identify issues relevant to the questions presented. Ultimately, it is the responsibility of the entity's stakeholders to address the issues. A situation report is a tool to improve effectiveness and efficiency. Unlike an audit, we do not validate the information provided by individuals or organizations provided for this report. If we improve government performance we will improve the lives of Vermonters.

– State Auditor Thomas M. Salmon, CPA, CFE

This small project was created from a preliminary review designed to attain clarifying information from a unit of state government, after certain concerns were brought to our attention. It is a report that simply represents questions and corresponding answers related to the department's efforts to control and reduce overtime.

We appreciate the cooperation we have received in this process and have no further questions at this time. The activities of any unit of government are the responsibilities of management and we hope that the attention by our office given to any area will ultimately improve transparency and performance.

On February 23, 2010, Auditor Salmon asked:

THOMAS M. SALMON, CPA
STATE AUDITOR



STATE OF VERMONT
OFFICE OF THE STATE AUDITOR

February 23, 2010

Mr. Thomas Tremblay, Commissioner
Department of Public Safety
103 South Main St.
Waterbury, VT 05671-2101

Dear Tom,

Last week's publicity about the "spiking" of overtime hours on the Governor's security detail has raised a number of questions.

More important to me than the particulars of the two officers mentioned in the article and the potential impact on their retirement benefits in years to come are larger issues related to the management of overtime costs in your department.

When you took over as commissioner in FY 2008, you began your own process of reviewing the budget and determining how Public Safety can deliver those protection services Vermonters have come to expect, but without breaking the bank to do so. Undoubtedly, the cost of budgeted and unbudgeted overtime throughout the department, but especially in the State Police unit, was a key issue for you.

I am writing to request an update from you on overtime and comp time issues. As you are well aware, spiking of pre-retirement wages has been a concern for many, including the State's recent Retirement Commission.

One large city, with a defined benefit retirement plan, did an audit on police overtime that noted the long-term risks of not managing overtime prudently:

Averaging 10 hours of overtime a week for 3 years can raise an officer's pension by more than 33%; averaging 20 hours can produce a 75% increase in pension. The potential for increasing their earnings and pensions is so great that officers are routinely manipulating their work schedules and disregarding overtime regulations to maximize overtime earnings. This also creates a disincentive for officers to seek promotions and higher levels of responsibility, as the ranks above Lieutenant are not eligible for overtime.

State legislation regarding changes to the teacher retirement program, now being reviewed in the Legislature, has language that excludes from retirement calculations any compensation over 10 percent from the previous year. Such restrictions will surely be discussed with other State employees and their bargaining units.

Would you be able to provide me with an overview of what you have done and what you are planning to do regarding strategies to better manage overtime costs in your department, including overtime for troopers approaching retirement?

The Administration is proposing a \$54.9 million appropriation for the State Police in FY 2011. I would be interested to know what percentage of this budget will be paid in overtime wages or compensatory time cost, and how this compares with previous years.

If you have reports, memos or studies from your staff or consultants on overtime issues since your assumption of command such as an overtime trend analysis; recommendations for contractual, operational and/or administrative changes to reduce overtime; or any internal audit reports or analysis on overtime management and compliance, I would appreciate receiving copies of these before Friday, March 12.

On a related matter, on February 20 of last year, the Public Safety Strategies Group released its report on law enforcement in Vermont and noted that four large state law enforcement groups – the State Police, the Fish and Wildlife Department, the Commercial Motor Vehicles enforcement group, and Department of Liquor Control enforcement – are currently under four separate command structures. The study recommended that these units be brought together under the command of the Public Safety Department, which could result in significant improvements in coordination and efficiency, perhaps including lower overtime costs. Could you let me know the status of this recommendation?

Thank you for your consideration of this request.

Sincerely,



Thomas M. Salmon, CPA
Vermont State Auditor

cc: Jeb Spaulding
Vermont State Treasurer

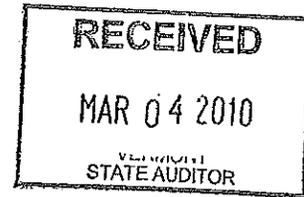
Neale Lunderville
Secretary, Agency of Administration

On, February 26, 2010, DPS Commissioner Thomas Tremblay responded:



State of Vermont
Department of Public Safety
103 South Main Street
Waterbury, Vermont 05671-2101
www.dps.state.vt.us

February 26, 2010



Thomas M. Salmon, CPA
State Auditor
Office of the State Auditor
132 State Street
Montpelier, Vermont 05633-5101

Dear Tom:

I am writing in response to your letter of February 23, 2010, in reference to the "spiking" of overtime hours on the Governor's security detail, and the management of overtime cost within the Department of Public Safety, Vermont State Police.

We have a responsibility to ensure that we are providing public safety services as efficiently as we can, and while we are advancing our efforts, this is an example where we can do much better; and we will.

Like all fifty states in our country, the State Police are assigned to provide security for their respective Governors. It is the sole responsibility of the Vermont State Police to appropriately supervise and manage this, to include controlling costs.

While I am pleased that our internal systems identified this concern, I am not pleased that we did not catch this sooner. Colonel Thomas L'Esperance has taken immediate action to remedy this matter, including shifting command of the Governor's Security detail for greater oversight.

We are happy to share with you our recent efforts to control overtime costs, in fact I just testified in House Appropriations that in FY2009 we achieved a significant reduction in overtime hours despite the increased demands for services. While we have to ensure that we are fulfilling our responsibilities of the collective bargaining agreement, we hope to continue this trend in FY10.



Thomas M. Salmon
State Auditor
132 State Street
Montpelier, Vermont 05633-5101

February 26, 2010

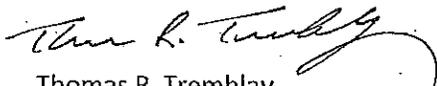
Page 2.

We are in the process of revamping our overtime coding to allow for greater analysis of what drives our costs; with the understanding that we need to control costs where we can, because we never know what criminal trends and public safety needs will arise that will impact our costs.

We are also in the process of working with the State Troopers' Association to address the long standing concern for "spiking" overtime for retirement which includes the discussion to cap overtime.

I will contact you directly to make arrangements to provide you with the information you have requested . The Vermont State Police and the Department of Public Safety take great pride in our service, our professionalism, and most importantly, our maintenance of the public trust. We look forward to sharing our efforts with you and seeking your guidance and advice to help us improve.

Respectfully,

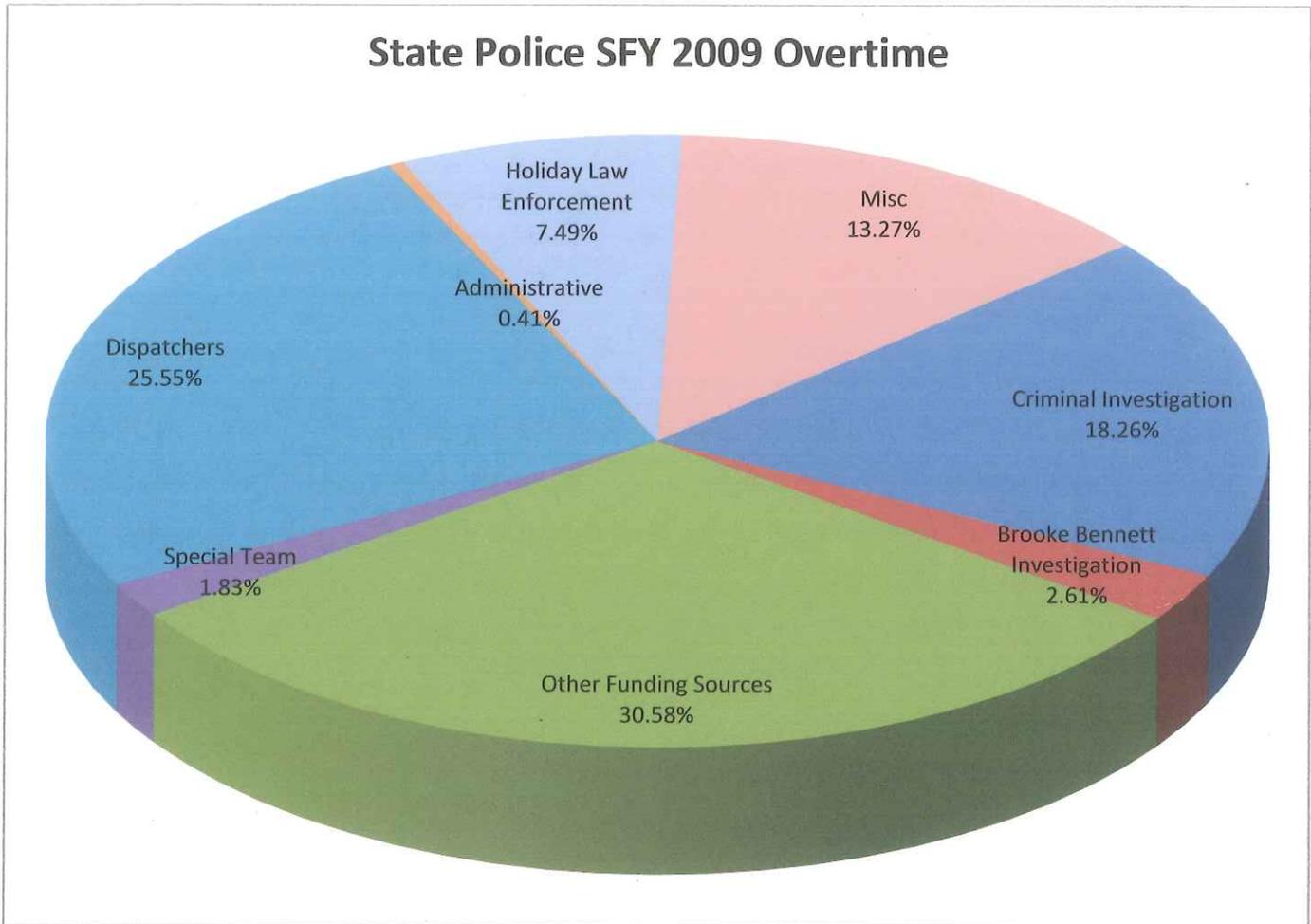


Thomas R. Tremblay
Commissioner

TRT/ddg

cc: Colonel Thomas L'Esperance
Joanne Chadwick, Business Administrator
Jeb Spaulding, State Treasurer's Office
Neale Lunderville, Agency of Administration

State Police SFY 2009 Overtime



Criminal Investigation: Includes motor vehicle accident, homicide, and all other criminal investigations.

Brooke Bennett Investigation: Costs associated with this specific high-profile search and subsequent criminal investigation case.

Other Funding Sources: Includes overtime funded with Federal grants, Interdepartmental or Special funding sources.

- **Federal Fund:** Funds overtime for programs such as Recreational Law enforcement (marine activities), High Intensity Drug Trafficking, Edward Byrne Crime Prevention, Evidence Forfeiture, Cops Methamphetamine for prevention of drug crimes, as well as Federal managed task force funding.
- **Interdepartmental Fund:** Funds overtime for programs such as Agency of Transportation Work Zone overtime for safety at work areas, Agency of Human Services overtime for welfare fraud investigation, Universal Service Fund overtime for E911 emergency communications.
- **Special Fund:** Funds overtime for programs such as DUI trooper coverage, Law enforcement for local towns, and law enforcement for special events such as the Vermont marathon.

Administrative: Overtime for all employees that are not sworn officers or part of the dispatch program (i.e. Info Tech Specialist (Kenny Madison), Alarm Coordinator (Margie Klark), Administrative Assistant S (Linda Willy, Karen Bates, Cindy Potter, Theresa Murdock), Auto mechanics (Robert Barron, Gary Sanders), along with the Colonel & Majors)

Special Teams: Overtime for: Crash Reconstruction Team; CSST, Dive Team; EOD Team; Honor Guard Unit; Hostage Negotiations Unit; K-9 Activation; Peer Support Team; Search & Rescue Team; Tactical Support Unit

Dispatchers: Shift coverage for Dispatcher sick time, annual leave, or training

Holiday Law Enforcement: Extra pay for work performed on a holiday. (on a paid holiday all state employees receive normal pay for their scheduled work hours. If that employee actually works on the holiday, they receive overtime in addition to their normal holiday pay)

Miscellaneous: Includes any overtime not coded to a specific project. This would include overtime worked immediately before or after regular shift. It also includes overtime for federal programs as match for federal funds.

On June 2, 2010, Auditor Salmon, Treasurer Jeb Spaulding and Audit Manager Steve Vantine met with Commissioner Tremblay and Colonel L'Esperance to discuss the issue of "spiking" overtime for State Police officers close to retirement. Colonel L'Esperance made the following presentation concerning State Police overtime.



State Police Overtime

PRESENTED BY COLONEL THOMAS L'ESPERANCE

JUNE 2, 2010

OVERVIEW

- ® Overtime for those close to retirement i.e. “spiking” issue.
- ® Driving Factors for State Police Overtime
 - ▷ Nature of the State Police Program
 - ▷ External Drivers - Funding Source
- ® Trend in Overtime Budget
- ® Comp Time Accumulation
- ® Overtime Management Strategies

OVERTIME FOR THOSE CLOSE TO RETIREMENT (I.E. SPIKING ISSUE)

® Governor's Security Detail

- ▷ Circumstances surrounding overtime
- ▷ Management strategies

® VSP Management & VTA support implementing an Overtime Retirement Cap

- ▷ Bill introduced to address spiking

WHAT DRIVES STATE POLICE OVERTIME

- ① Law Enforcement
- ① Emergency Response
- ① Criminal Investigations
- ① Assisting Other Agencies
- ① Dispatch Staffing Needs
- ① Training
- ① 24 Hour and Holiday Coverage

WHAT DRIVES STATE POLICE OVERTIME (2)

- ① Federal Funds: depend on grant activity.
 - ▷ Antiterrorism Initiative
 - ▷ ATF Task Force
 - ▷ Edward Byrne Memorial State & Law Enforcement Assistance (Drug Enforcement)
 - ▷ Cops Methamphetamine
 - ▷ Joint Terrorism Task Force (JTTF)
 - ▷ Recreational Boating Safety
 - ▷ Domestic Cannabis Eradication/ Suppression Program MERT
 - ▷ ARRA - Byrne/ JAG Formula Grant

WHAT DRIVES STATE POLICE OVERTIME (3)

- ① Interdepartmental Funds: Much of this is event driven.
 - Ongoing overtime agreements for other departments include:
 - ∠ Agency of Transportation Work Site traffic enforcement.
 - ∠ Agency of Transportation Motor Carrier Safety Program. (Ended November 2008)
 - ∠ Agency of Transportation CARE
 - ∠ Governor Highway Safety Program DUI enforcement. (separate from DUI 2% of motor fuel tax funding)
 - ∠ Vt Center for Crime Victim Service Grant to Encourage Arrest (domestic violence).
 - ∠ Agency of Human Services Welfare Fraud Investigation.
 - ∠ Universal Service Fund E911 Emergency Response. (moved to Interfunds from special funds FY2009, end FY2010)

WHAT DRIVES STATE POLICE OVERTIME (4)

④ Special Funds

- ▷ Overtime for troopers funded with DUI special fund.
- ▷ Overtime funded with False Alarm response special fund.
- ▷ Traffic Control and Law Enforcement Contracts with towns and organizations.
- ▷ Law Enforcement Contracts for Special Events such as the annual Green Mountain Stage Race.
- ▷ Click it or Ticket patrols for Vermont Sheriff's Association. (2008 \$53K, 2009 \$28K)
- ▷ START (Stop Teenage Alcohol Risk Team).
- ▷ Snowmobile VAST patrols.

WHAT DRIVES STATE POLICE OVERTIME (5)

- ④ State Funds
 - ⇒ Overtime has been consistently under-budgeted over the years.
 - ⇒ 2011 overtime budget has been presented at a manageable level.

TREND IN OVERTIME BUDGET

- ® In 2007 and 2008 we asked for and received additional overtime spending authority in the Budget Adjustment Act however this amount does not add to the base for the following year's budget.
- ® Budget amounts for overtime in prior years were not adjusted to reflect actual spending needs. In FY11, DPS presented a budget that is manageable.

All Funds				
Year	Actual	Budget	BAA	Adj Budget
2007	3,273,837.32	3,037,721.00	398,337.00	3,436,058.00
2008	3,345,463.97	2,231,121.25	450,000.00	2,681,121.25
2009	3,395,727.65	2,343,427.00		2,343,427.00
2010	3,426,695.88	2,343,427.00		2,358,427.00
2011	3,246,434.00	3,246,434.00		3,246,434.00

2011 Budget Inc from 2010 903,007.00

TREND IN OVERTIME BY YEARS OF SERVICE

Type	years of service	2006	2007	2008	2009	2010
Civilians	Avg 0-10 OT	214.77	251.08	238.52	252.08	186.27
	Avg 10-20 OT	282.52	257.12	387.54	480.61	346.22
	Avg 20-30 OT	230.76	255.74	307.45	218.75	195.58
	Avg 30-40 OT	296.40	75.06	86.56	8.50	8.75

Type	years of service	2006	2007	2008	2009	2010
Sworn	Avg 0-10 OT	226.75	217.68	219.71	207.64	187.11
	Avg 10-20 OT	238.72	222.72	244.31	235.09	189.28
	Avg 20-30 OT	230.76	255.74	307.45	218.75	195.58
	Avg 30-40 OT	25.00	34.21	87.09	37.05	105.29
	Avg Above 40 years OT	0.00	0.00	0.00	2.50	0.00

Dept. Code	2006	2007	2008	2009	2010
Civilian Overtime Hours Total	35,876.10	36,710.89	40,751.60	37,904.68	27,386.71
Sworn Overtime Hours Total	82,260.92	78,934.37	79,272.86	72,583.80	64,481.78

OVERTIME PERCENTAGE OF BUDGET

All Funds			
Year	Overtime	Total Budget	% of Budget
2007	3,273,837.32	44,995,162.00	7.28%
2008	3,345,463.97	45,651,007.00	7.33%
2009	3,395,727.65	47,748,858.00	7.11%
2010	3,426,695.88	54,020,827.00	6.34%
2011	3,246,434.00	54,156,900.00	5.99%

Overtime amount is the actual cost in that year except those noted in blue which are estimated expense.

TREND IN COMP TIME ACCUMULATION

All Funds	
Year	Comp Time
2007	77,665.73
2008	47,443.38
2009	161,951.56

The amount represented above accounts for the Comp time accumulation that was paid out in cash over the last 3 years.

2007 had one prior year comp payout. 2008 only accounted for retirement comp pay outs. 2009 paid both 2008 and 2009 prior year comp balances.

Comp pay is driven by several provisions in the employee contracts including; overtime, standby, call in, special team pay, holidays, and physical fitness allowance.

OVERTIME MANAGEMENT STRATEGIES

- Ⓡ Set up new tracking codes
 - ▷ Includes updating our training to ensure proper use
- Ⓡ Monthly meeting to address overtime
 - ▷ New reports developed to analyze and monitor overtime
 - ◁ Sharing best practices among the 14 offices & 4 PSAPs in VSP
 - ▷ Comprehensive review of contract provisions and continual improvements in processes
- Ⓡ Support legislation to address spiking

COMP TIME MANAGEMENT STRATEGIES

- ④ Developing a policy with a cap on comp time accumulation
 - ▷ 80 hours for dispatchers
 - ▷ 60 hours for other civilians

THOMAS M. SALMON, CPA
STATE AUDITOR



STATE OF VERMONT
OFFICE OF THE STATE AUDITOR

June 30, 2010

Commissioner Thomas R. Tremblay
Department of Public Safety
103 South Main Street
Waterbury, VT 05671

Dear Commissioner Tremblay,

I wanted to thank you and your staff for meeting with Treasurer Jeb Spaulding, SAO Audit Manager Steve Vantine and myself on June 2, 2010 to discuss the recently publicized issue of "spiking" overtime for those State Police Officers close to retirement. In these times of fiscal uncertainty for our State, issues that arise such as this can do great damage to the taxpayers' confidence in our government and in our valued state employees. Sustained attention to monitoring, managing and minimizing this overtime will help to control current and long-term costs. This will help to keep the current State Police employee pension plan viable while remaining a valuable and attractive recruitment tool for new officers.

I was particularly impressed with Colonel L'Esperance's presentation on the cause of State Police overtime and the efforts currently underway to improve overtime management. I am pleased the Department of Public Safety is focused towards better utilizing its internal resources and committed to using budgeting tools and providing information to State Police leadership to monitor and analyze employee overtime. I look forward to reviewing your progress in this area in the future. Again, thank you for meeting with us.

Sincerely,

A handwritten signature in blue ink that reads "Tom".

Thomas M. Salmon, CPA
State Auditor

On January 20, 2012, Auditor Salmon, in a follow-up on the 2010 action plan of the DPS concerning State Police overtime, asked:

THOMAS M. SALMON, CPA, CFE
STATE AUDITOR



STATE OF VERMONT
OFFICE OF THE STATE AUDITOR

January 20, 2012

Commissioner Keith Flynn
Department of Public Safety
103 South Main Street
Waterbury, VT 05671

Dear Commissioner Flynn,

Keith

Our office is seeking follow-up information on past overtime pay practice issues in the Department of Public Safety. On June 2, 2010, I met with then DPS Commissioner Tom Tremblay, then State Treasurer Jeb Spaulding, SAO Audit Manager Steve Vantine and members the Vermont State Police to discuss the issue of "spiking" overtime for those State Police officers close to retirement. This "spiking" of overtime issue was exacerbated by the media when they published the levels of overtime paid to members of the governor's security detail (and the effect it had on their future retirement benefits).

Colonel L'Esperance gave us a presentation on the cause of State Police overtime and the efforts that were planned and were under way at the department to improve overtime management. Additionally, the issue of "spiking" overtime was somewhat mitigated by a change in legislation in 2010, changing the qualified earnings calculations used in determining retirement pay.

Specifically, I would like to receive an update on the progress in the area of labor costs and overtime management, including any problems or challenges you have faced in the past 18 months regarding this issue.

This time of year creates additional demands on all of us in state government. To help you manage this request, I ask that you provide our office with the update by February 28, 2012. As before, should your staff wish to present their efforts on overtime management with me personally, we can schedule a convenient time later on in the year. I look forward to reviewing your department's progress in this area and thank you for your cooperation.

Sincerely,

Tom

Thomas M. Salmon, CPA, CFE
Vermont State Auditor

cc: Jeb Spaulding, Secretary of Administration
Colonel Thomas L' Esperance, Director, Vermont State Police

On March 1, 2012, we received the following response
from DPS Commissioner Keith Flynn:



State of Vermont
Department of Public Safety
103 South Main Street
Waterbury, Vermont 05671-2101
www.dps.state.vt.us



Thomas M. Salmon
Vermont State Auditor
132 State Street
Montpelier, VT 05633-5101

Dear Auditor Salmon,

In response to your letter dated January 20, 2012, the Department of Public Safety (DPS) would like to submit the enclosed Vermont State Police (VSP) overtime comparison from Vermont State Fiscal Year (SFY) 2009 through 2011 for your review.

As you will see in the "Total VSP" chart at the bottom of the page, the data shows that for all of VSP, total overtime hours have been reduced from SFY 2009 levels. While the total sworn overtime (adjusted for the additional 27th pay period that occurred in FY11) is above the FY09 level, that is largely attributable to several high profile investigations that occurred that year, particularly the O'Hagen missing person/homicide case.

The O'Hagen case generated over 2,000 hours of overtime in October and November of SFY11 for our Field Force, Criminal Investigation, and Special Teams units, and in fact continues to generate overtime hours as the investigation of the case continues into SFY12. Unanticipated high intensity cases such as the O'Hagen case will impact our best efforts in controlling overtime.

In spite of the uncertain nature of our need for response in cases such as this, DPS/VSP understands that it is essential to control overtime wherever possible. DPS/VSP is continuing to monitor overtime on a regular basis during regular budget review meetings. To illustrate, in FY09 our analysis showed that, on a per capita basis, Civilian (particularly Dispatcher) overtime, was particularly high as compared to total VSP overtime. In FY10 this issue was analyzed and steps were taken to control/reduce these levels of overtime, and as you'll see from the data, we were able to reduce this overtime by almost 18% in FY11 over FY09 levels.

We are continuing our efforts to understand and control our overtime costs going forward using data to drive our efforts. I look forward to discussing this information with you at your convenience should you have any additional questions.

Best Regards,

Keith W. Flynn
Commissioner, Department of Public Safety

cc: Jeb Spaulding, Secretary of Administration
Colonel Thomas L'Esperance, Vermont State Police



Department of Public Safety-Division of the VT State Police

Overtime Hours 2009 - 2011 - All Funds

Totals of Sworn and Civilian - adjusted*

*(2011 adjusted to remove extra 27th pay period that occurred in FY11 for comparison purposes using an average of all 27 pay periods)

Total Sworn

Sum of Hours Check Date	State Fiscal Year			2011 Comparison to prior SFY	
	2009	2010	2011	Change from 2009	Change from 2010
Jul	9,976.97	8,745.23	7,901.52	-20.80%	-9.65%
Aug	5,373.20	4,854.75	4,999.46	-6.96%	2.98%
Sep	6,638.74	5,956.74	6,359.87	-4.20%	6.77%
Oct	5,223.99	5,070.76	7,811.98	49.54%	54.06%
Nov	4,682.75	4,628.98	6,635.73	41.71%	43.35%
Dec	6,867.74	7,428.25	7,132.53	3.86%	-3.98%
Jan	4,970.25	4,752.24	4,999.23	0.58%	5.20%
Feb	4,343.50	4,701.00	5,250.97	20.89%	11.70%
Mar	4,352.44	4,577.21	4,391.23	0.89%	-4.06%
Apr	4,480.28	4,775.94	4,517.98	0.84%	-5.40%
May	4,688.74	4,516.50	5,037.22	7.43%	11.53%
Jun	5,831.75	6,282.12	5,847.15	0.26%	-6.92%
Grand Total	67,430.36	66,289.72	70,884.87	5.12%	6.93%

Total Civilian

Sum of Hours Check Date	State Fiscal Year			2011 Comparison to prior SFY	
	2009	2010	2011	Change from 2009	Change from 2010
Jul	3,824.72	3,722.76	3,305.25	-13.58%	-11.22%
Aug	2,788.99	2,462.25	2,499.25	-10.39%	1.50%
Sep	2,736.24	2,483.25	2,145.77	-21.58%	-13.59%
Oct	2,872.00	2,932.00	2,226.00	-22.49%	-24.08%
Nov	2,356.25	2,817.24	2,257.99	-4.17%	-19.85%
Dec	3,570.51	3,522.00	3,079.74	-13.74%	-12.56%
Jan	1,961.00	2,058.25	1,535.51	-21.70%	-25.40%
Feb	1,987.50	1,868.73	1,440.01	-27.55%	-22.94%
Mar	2,320.00	1,952.00	1,583.01	-31.77%	-18.90%
Apr	2,062.24	2,133.51	1,445.00	-29.93%	-32.27%
May	2,393.01	2,057.26	2,206.75	-7.78%	7.27%
Jun	2,298.50	2,247.75	1,884.30	-18.02%	-16.17%
Grand Total	31,170.96	30,257.00	25,608.58	-17.84%	-15.36%

Total VSP

Sum of Hours Check Date	State Fiscal Year			2011 Comparison to prior SFY	
	2009	2010	2011	Change from 2009	Change from 2010
Jul	13,801.69	12,468.00	11,206.76	-18.80%	-10.12%
Aug	8,162.19	7,317.00	7,498.71	-8.13%	2.48%
Sep	9,374.97	8,439.99	8,505.63	-9.27%	0.78%
Oct	8,096.00	8,002.75	10,037.98	23.99%	25.43%
Nov	7,039.00	7,446.22	8,893.72	26.35%	19.44%
Dec	10,438.25	10,950.25	10,212.27	-2.16%	-6.74%
Jan	6,931.25	6,810.49	6,534.74	-5.72%	-4.05%
Feb	6,331.00	6,569.72	6,690.97	5.69%	1.85%
Mar	6,672.44	6,529.22	5,974.24	-10.46%	-8.50%
Apr	6,542.52	6,909.45	5,962.99	-8.86%	-13.70%
May	7,081.75	6,573.76	7,243.97	2.29%	10.20%
Jun	8,130.25	8,529.87	7,731.46	-4.91%	-9.36%
Grand Total	98,601.32	96,546.72	96,493.45	-2.14%	-0.06%

*In SFY 2011 July, Dec and June had 3 paydates although the 3rd paydate in June has been adjusted to reflect a two paydate month and a 26 paydate year for comparison purposes.