

TESTIMONY OF ROBERT J. HOBBS¹
NATIONAL CONSUMER LAW CENTER²
IN SUPPORT OF

SB 373 Nevada Wage Protection Act
March 26, 2013

SB 373 proposes to move Nevada up a notch from where it is now in its protection of consumers from the financial devastation that results when struggling wage earners are faced with a garnishment suddenly taking 25% their wages from their paycheck. SB 373 will reduce the amount that can be taken from wages in any pay period to 10%.

Five states effectively *prohibit* the garnishment of *all* wages in many situations:

South Carolina³,
Florida⁴,
Pennsylvania⁵,
North Carolina,⁶ and
and Texas.⁷

By adopting SB 373, Nevada would join the top tier of states that limit wage garnishment to a small portion of wages. This includes Missouri, Iowa, Nebraska, Nebraska, and Massachusetts. A likely result will be to reduce the personal bankruptcy

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² The National Consumer Law Center, Inc., (hereinafter "NCLC") is a national non-profit research and advocacy organization founded in 1969 that focuses on the legal needs of low-income, financially distressed, and elderly consumers. NCLC is a nationally recognized expert on consumer protection issues and has drawn on this expertise to provide information, legal research, policy analyses, and market insight to Congress and state legislatures, administrative agencies, and courts for more than forty years. NCLC provides training programs for over a thousand consumer lawyers each year on using consumer protection laws to seek justice for their clients.

³ See, S.C. Code § 15-39-410.

⁴ See, Fla. Stat. § 222.1. Florida's "head of family" exemption effectively prohibits the garnishment of income from heads of families absent their written permission.

⁵ See, 42 Pa. Cons. Stat. § 8127. Wage garnishment for commercial debt is not permitted in Pennsylvania.

⁶ See, e.g., N.C. Gen. Stat. § 1-362. North Carolina only allows to be garnished for the following types of debts: taxes, student loans, child support, alimony, and payment of ambulance services in certain North Carolina counties.

⁷ See, Charts 1 and 2.

filings in Nevada thereby allowing more families to work with all of their local creditors to work out their debts. As shown by Chart 3 at the end of this testimony, States with strong consumer protections against wage garnishment have, on average, lower bankruptcy rates than states that do not.⁸

The need for SB 372 flows from the myriad abuses by lenders, banks, and other members of the financial services industry over the past few decades. Predatory and exotic mortgages pitched to unsophisticated borrowers caused millions of foreclosures, stripped billions in wealth, and precipitated the worst economic downturn since the Great Depression. Payday lenders proliferated across the country, trapping consumers on debt treadmills through triple digit APR loans.

Some of the worst abuses were perpetrated by the credit card industry. Lenders imposed sky-high interest rates on struggling consumers, and charged them enormous and excessive penalty fees using hair-trigger tactics. They flooded the mailboxes of American consumers with applications, recklessly offering credit cards to students and other consumers who did not have means to repay their debts.

One of the fundamental problems with credit cards is that the lender has the absolute power not only to impose terms at the outset, but to change those terms unilaterally at its whim. Lenders draft the contracts and offer them to consumers on a “take it or leave it” basis. These contracts often give the lender the power to change the terms, and the consumer is considered to have “accepted” the changes if s/he merely uses the credit card again. While a savvy consumer can comparison shop for the initial terms, s/he has no such ability when the lender changes the terms of the existing contract.

The Great Recession put enormous financial stress on consumers as millions lost their jobs, homes and suffered other losses. Historically, about 4.4 percent of consumers have been behind on their credit cards (one to six months late); this jumped to 6.6 percent by early 2009. By the end of 2009, banks charged off delinquencies over 180 days as uncollectible for 9.1 percent of their credit card loans, nearly triple the 3.4 percent rate from 2006.⁹

As consumers fell behind on their credit cards and other debts, this created an enormous explosion in the collection of these debts. In California alone, collection lawsuits have increased by twenty percent statewide over the past five years.¹⁰ Debt collectors filed over 450,000 lawsuits in New York City alone from 2006 to 2008, obtaining an estimated \$1.1 billion in judgments and settlements.¹¹ In 2007, the debt collection industry employed 217,000 collectors and posted annual revenues of \$58 billion.

⁸ Credit is due to Emily Rochon a Northeastern University Law Student intern at the National Consumer Law Center for preparing Chart 3 and other assistance with this testimony.

⁹ See, Robert Hobbs and Rick Jurgens, National Consumer Law Center, *The Debt Machine*, at 5 (July 2010), available at http://www.nclc.org/images/pdf/debt_collection/debt-machine.pdf [hereinafter “The Debt Machine”].

¹⁰ *Id.* at 12-16 (citing statistics on growth in debt collection in other states).

¹¹ Claudia Wilner and Nasoan Sheftel-Gomes, Neighborhood Econ. Dev. Advocacy Project and Urban Justice Center, *Debt Deception: How Debt Buyers Abuse The System To Prey On Lower- Income New Yorkers 1* (May 2010), available at http://www.nedap.org/pressroom/documents/DEBT_DECEPTION_FINAL_WEB.pdf [hereinafter NEDAP, *Debt Deception*].

With this tremendous growth in debt collection, there has also been an increase in a number of abuses, most notably by debt buyers who purchase defaulted consumer debts for pennies on the dollar. These abuses have become so widespread and egregious as to prompt the Federal Trade Commission to conclude that “the system for resolving disputes about consumer debts is broken.”¹² Millions of consumers have been victims of abusive debt collection, resulting in faulty judgments against them, wage or benefit garnishments, frozen bank accounts, and ruined credit records that could prevent them from obtaining insurance, housing or even employment.

Debt buyers purchase accounts in bulk, typically obtaining only an electronic spreadsheet with minimal information about the debt. Most of the time, they do not purchase the underlying documentation of the debt, including the credit application, account agreement, monthly statements, payment records, and customer service records that would reflect customer disputes. While debt buyers sometimes have the ability to go back to the creditor and request documentation of the debt for a fee, in the vast majority of cases filed by debt buyers in court, do not have this documentation in hand or available. Their business model depends on making claims without validation and obtaining judgments by the default against confused and overwhelmed consumer defendants.

As a result of this lack of documentation, as well as their attempts to collect on very old debts, debt buyers frequently pursue flawed claims. The FTC has concluded that “the information received by debt collectors is often inadequate and results in attempts to collect from the wrong consumer or to collect the wrong amount.”¹³ Some of the claims go into collection when they have already been settled or paid in full, others were someone else’s debt, and some were created by an identity thief. Still others are beyond the statute of limitations, were discharged by the consumer in bankruptcy, or were disputed with the original credit card company years before by the consumer for fraud, nonperformance, or another problem. A report by several New York City nonprofit and legal services organizations found that 35% of debt buyer lawsuits were clearly meritless.¹⁴

It is for these reasons, as well as others, that NCLC developed the Model Financial Protection Act. It is also why NCLC supports SB 373. Shielding a greater percentage of income from garnishment should serve to discourage some of the unscrupulous practices in the marketplace and limit the damage done to individuals and families in the event a creditor is awarded a garnishment on the basis of a meritless claim. Furthermore, limiting the percentage of an individual’s wages eligible for garnishment to 10%, makes it more likely that a consumer will be able to continue to meet their other obligations, e.g. pay for rent, utility bills, medical expenses, and food- while a creditor is garnishing their wages.

Critics of this bill are likely to argue that it will dry up credit and increase the price of credit. Whenever legislation is introduced to protect consumers from a harsh

¹² Federal Trade Commission, *Repairing a Broken System: Protecting Consumers in Debt Collection and Arbitration* (July 2010) at I (Executive Summary), available at <http://www.ftc.gov/os/2010/07/debtcollectionreport.pdf> [hereinafter “FTC, *Repairing a Broken System*”].

¹³ Federal Trade Commission, *Collecting Consumer Debts: The Challenges of Change, A Workshop Report*, at 24 (Feb. 2009).

¹⁴ NEDAP, *Debt Deception* at 2.

debt collection remedy, like a sudden garnishments, this is the mantra. However, the argument is basically an empirical argument and is seldom accompanied by reliable evidence. We do not believe consumers in the states that prohibit or restrict garnishments as would SB 373 are complaining about that protection.

Congress and the states have repeatedly increased their protections for consumers over the last half a century and consumer credit outstanding has nevertheless increased each decade. Some would argue that the increases have been too great and more a burden than an advantage. The only factor that predictably diminishes the availability of consumer credit are business recessions. The only factor that predictably affects the price of consumer credit is the monetary policy of the Federal Reserve Board. Both of those factors have proven temporary.

Massachusetts increased its exemption for wages a few years ago without any industry opposition, and only gratitude has been conveyed by lawyers working with the consumers affected.

In summary, NCLC respectfully urges the legislature to support this SB 373 and to work quickly to pass it into law.

Chart 1: REPORT CARD

PROPERTY PROTECTED IN FINANCIAL EMERGENCIES, BY STATE¹⁵

	Wages	Home	Household Goods	Car	Tools	Bank Account	Pension s
AK	A	C+	D	D	D	C	A
IA	A	A	C	C+	B	D	A
NC	A	D	B	D+	D	F	A
PA	A	D	F	F	F	C	A
SC	A	F	B	C	D	A	A
TX	A	A	B	B	B	F	A
FL	A-	A	D+	F	D+	A	A
MO	A-	F	D	D	D	D	A
NCLC Model	A-	B+	A	A	B+	A	A
NY	A-	D	C	C-	D	D	A
DE	B	D-	B	C	C	F	A
HI	B	F	A	D-	A	F	A
IL	B	D	C-	C+	D-	C-	A
MA	B	B	A	C+	C+	B	A
NJ	B	D	F	F	F	F	A
SD	B	A	C	D	D	D	
VT	B	C	B	D-	C	C-	A
AZ	B-	B	D+	C	D	F	A
NE	B-	D	F	C-	D	F	D
WV	B-	D-	C+	C	D	D-	A
WI	B-	C+	A	C	A-	A	A
CA	C+	D-	D	D-	C	B	A
NV	C+	A	B	B+	B	B	C
NH	C+	C	C-	C-	C	D	A
ND	C+	D	C	C-	D	D	D
AL	C	F	F+	F+	F+	F+	A
CO	C	D-	D	C	A	F	A
CT	C	D-	A	D	A	D	A
DC	C	A	B-	D-	F	F	D
GA	C	F	C	D-	F	F	A
ID	C	D-	C+	C+	D	F	A
IN	C	F	C-	D+	D+	F	A
KS	C	A	A	A	C	F	A
KY	C	D	C-	D-	D	F+	A
LA	C	F	A	C+	A+	F	A
ME	C	C	D	C	C+	F	A
MD	C	D	D	C	C	F	A
MN	C	A-	B-	C-	B	C	D
MS	C	C	C	C	C	C	A
MT	C	A	C-	D-	C	F	A
NM	C	C	D	C-	D	F	A
OH	C	D	B	D	D	D	A
OK	C	A	A	C+	B	F	A

¹⁵ Grading based on state laws enacted as of June 2012.

OR	C	F	D	D	C	D	B
TN	C	F	C	C	F	C	A
UT	C	F	F	D-	D+	F	A
VA	C	D	C	C	B	F	A
WA	C	D-	B	D+	B+	C	A
WY	C	F	D	D-	F	F	A
MI	D	D	F	A	F	B	A
RI	D	B	B	B	F	F+	A
AR	F	A	F	F	F	F	A

Chart 2: SUMMARY OF PROPERTY PROTECTED IN FINANCIAL EMERGENCIES, BY STATE¹⁶

	Wages	Home	Household Goods (HHG)	Car	Tools	Bank Account	Pensions
Model Law	80 x min. wage, 90% to \$70,000 annual, 85% if more	Median price in metro or rural area	Most HHG up to \$3000/item, & \$10,000 wildcard	\$15,000, or \$25,000 for disabled	\$30,000, \$50,000 farm	\$10,000	Up to \$1,000,000 /individual & dependents
AL	75%	\$ 5000 per spouse	\$3000	Included in HHG	Included in HHG	Included in HHG	
AK	\$2860/mo.	\$70,200, TBE ¹⁷	\$3900	\$3900	\$3640	\$1400	Yes
AZ	75% or 85% if hardship	\$150,000	\$4000	\$5000; \$10,000 disabled	\$2500 plus \$2500 farm	\$150	Yes
AR	\$25/wk	Homestead on ¼ acre in city or 80 rural acres	\$800, or \$1250 married ¹⁸	\$1200 in bankruptcy	\$750 in bankruptcy	\$200, \$500 married wild card	Yes
CA	75% or 30 x fed. min. wage, more if necessary	\$75,000; \$100,00 married; \$175,000 if 55 yrs. and low-income; \$175,000 if 65+ yrs. or disabled	\$550, up to \$21, 825 for non-home owners	\$2725	\$7175 per spouse, includes commercial vehicle up to \$4850 per spouse	75% of wages or \$1425 to \$4300 of gov't. benefits	Yes
CO	Greater of 30 x CO min. wage, 75%, or by court	\$60,000; \$90,000 if 60+ yrs.	\$3,000	\$5,000; \$10,000 if elder	\$20,000 or \$50,00 farm	NA	Yes
CT	Greater of 40 x CT or US min. wage or 75%	\$75,000, \$125,000 for hospital debt	Necessary, \$1000 wildcard	\$3,500	Necessary tools	Rental deposit, \$ 1000 wildcard	Yes
DE	85%	None; \$125,000 in Bankr., TBE	Apparel, bedding; \$25,000 in Bankr.	None; \$15,000 car & tools in Bankr.	\$50 - 75; \$15,000 car & tools in Bankr	College Investment Plan Account	Yes

¹⁶ See National Consumer Law Center, *Collection Actions Appx. G* (2nd Ed. 2011) and William H. Brown, *Bankruptcy Exemption Manual* (2011-2012 Ed.)

¹⁷ Tenancy by the entirety protects home of spouses from one spouse's creditors.

¹⁸ In re Holt, 894 F.2d 1005 (8th Cir. 1990) held that the \$500 maximum exemption in the Ark. Constitution set the ceiling for personal property. Cf. Boellner v. Clinical Study Centers, 2011 WL 66186 (Ark. 2011) where the court did not rule on the lower court's holding that the Constitutional personal property exemption set a floor, not a ceiling.

	Wages	Home	Household Goods (HHG)	Car	Tools	Bank Account	Pensions
DC	75% or 30 x fed. min. wage	All	\$8,625, wildcard \$850 or \$8075 if no homestead	\$2,575	\$1625, plus \$300 desk & library	NA	Public and \$400 of private payments
FL	\$750/wk	½ acre in city, or 160 acres, TBE	\$1,000; \$4000 wildcard if no homestead	\$1,000	wildcard	6 mos. exempt wages, wildcard	Yes
GA	75% or 30 x fed. min. wage	\$10,000; up to \$20,000 in Bankr.	\$5,000	\$3,500 in Bankr.	\$1500 in Bankr.	NA	Yes, paid treated as wages
HI	95% of \$100; 90% of next \$100; 80%	\$20,000; \$30,000 head of hsd. or elder	Necessary furniture, appliances, books	\$2,575	Necessary tools	NA	yes
ID	75% or 30 x fed. min. wage	\$100,000	\$7500	\$7,000	\$2500	NA	yes
IL	85% or 45 x fed. min. wage	\$15,000 to \$30,000 co-owned, TBE	\$4,000 wildcard	\$7,000	\$1500	Wildcard; state college plan	Yes
IN	75% or 30 x fed. min. wage	\$17,600 or \$17,600 per spouse	\$9350 wildcard	wildcard	wildcard	\$350	Yes
IA	90% or less	Residence on ½ acre in city, or 40 acres, TBE	\$7,000	\$7,000	\$10,000	\$1000 wildcard	Yes
KS	75% or 30 x fed. min. wage	Residence on 1 acre in town, or 160 acres	Necessary household goods	\$20,000 or more if disabled	\$ 7500	NA	Yes payable, yes pubic pension paid
KY	75% or 30 x fed. min. wage	\$5,000; \$6000 in Bankr., TBE	\$3,000	\$2,500	\$300, \$3000 for farm, \$1000 office, \$2500 vehicle	\$1000 wild card in Bankr.	Yes
LA	75% or 30 x fed. min. wage	\$35, 000	household goods	\$7,500 of equity; 2d car for disabled	Tools, trailer, some livestock	NA	Yes
ME	75% or 40 x fed. min. wage	\$47,500 to \$190,000	Household goods up to \$200 per item	\$5000	\$5,000, 5 ton fishing boat, farm equipment	NA	Yes
MD	75% or \$ 145 per week	\$6,000 "wildcard"; \$11,000 in Bankr., TBE	\$1,000; \$6,000 in Bankr.	\$6,000 "wildcard"	\$5000	wildcard	Yes

	Wages	Home	Household Goods (HHG)	Car	Tools	Bank Account	Pensions
MA	85% gross wages or 50 x min. wage	\$125,000 to \$1,000,000, TBE	Household goods, & wildcard \$1000 to \$6000	\$7500; \$15,000 if elder or disabled	\$5000, \$5000 stock in trade, \$1500 boat and tackle	\$2500 & wildcard	Yes
MI	60%	\$3,500, TBE	\$1,000	Business vehicle	\$1000	\$2500	Yes
MN	75% or 40 x fed. min. wage	\$360,000, or \$900,000 farm, TBE	\$9,900	\$4,400, or \$44,000 for disabled	\$10,500; \$13,000 farm implements	20 days of wages; 60 days of public benefits	Yes to \$66,000
MS	75% or 30 x fed. min. wage exempt for 30 days	\$75,000, \$150,000 if married in Bankr., \$30,000 mfg. home	\$10,000 wild card, \$50,000 for elders	Included in goods wildcard	Included in goods wildcard	Cash included in goods wildcard, bank accounts included in elder wildcard	Yes
MO	90% head of family, or 75%	\$15,000; \$5000 mfg. home	\$3,000, \$600 wildcard, \$1250 head of hsl. wildcard plus \$350 per child or disabled dependent	\$3,000	\$3000	\$600 wildcard	Yes, necessary standard limits paid
MT	75% or 30 x fed. min. wage	\$250,000	\$4,500	\$2,500	\$4500, \$600 max. per item	\$500 in coop. assoc.	IRA's
NE	85% head of hshld. for 60 days; 75% or 30 x fed. min. wage	\$60,000 for head of hsl. or elder	\$1,500	\$2400 or tools of trade, \$2500 wildcard	\$2400 plus wildcard per spouse	NA	Necessary pension plans and annuities up to \$100,000 and public pensions
NV	75% or 50 x fed. min. wage	\$550,000	\$12,000, \$1000 wildcard	\$15,000 per person; one vehicle for disabled	\$10,000; \$4500 mining; \$4500 farming	wildcard	Yes, to \$500,000
NH	50 x fed. min. wage	\$100,000 & wildcard	\$3,500, wildcard of \$1000 and up to \$7000 of unused exemptions	\$4,000 & wildcard	\$5000 & wildcard	wildcard	Yes

	Wages	Home	Household Goods (HHG)	Car	Tools	Bank Account	Pensions
NJ	\$48/week, or 90% if under 250% of the poverty level	None, except tenancy by entireties	\$1,000 wildcard	wildcard	wildcard	wildcard	Yes
NM	75% or 40 x fed. min. wage	\$60,000, or \$120,000 if jointly owned	Furniture & books, up to \$500 wildcard and up to \$5000 if no homestead	\$4,000 & wildcard	\$1500 & wildcard	wildcard	Yes
NY	90% or 30 x min. wage	\$75,000 to 150,000	\$5,000	\$4000, \$10,000 for disabled	\$3000	\$1000 in bank or other property	Yes, paid and payable
NC	To the extent needed	\$35,000, \$70,000 joint, \$60,000 for some elders, TBE	\$5,000 & up to \$4,000 for four dependents; up to \$5,000 wildcard for unused homestead	\$3,500 & wildcard	\$2000 & wildcard	wildcard	Yes
ND	75% or 40 x fed. min. wage & \$20/dependent	\$100,000, mfg. home	\$1,000/ hsd., \$3750 individual wildcard, \$7500 head of hsd. wildcard,	\$2950, up to \$32,000 for disabled, wildcard	\$1500, \$4500 farm equipment, wildcard	wildcard	Yes public, private up to \$200,000
OH	75% or 30 x fed. min. wage	\$53,375,\$100,000 married unlimited for medical debts, TBE	\$10,775, \$525 per item	\$ 5,350	\$1,600	\$425	Yes payable, necessary for paid
OK	75% or 30 x fed. min. wage, more for hardship	Residence and 1 acre or 160 acres not within the city	Necessary household goods	\$7,500	\$10,000	NA	Yes
OR	75% or 40 x fed. min. wage	\$40,000, \$50,000 married	\$3,000	\$3000 per person	\$5000 per person	\$400 wildcard	Yes, \$500/mo. annuity payments
PA	All with some exceptions	None except tenancy by entireties	\$300 wildcard	wildcard	wildcard	wildcard & exempt funds up to \$10,000	Yes
RI	\$50/wk	\$300,000 & tenancy by the entireties	\$9,600	\$12,000	\$1500	\$50 in coop. assoc., \$5000 wildcard in Bankr.	Yes

	Wages	Home	Household Goods (HHG)	Car	Tools	Bank Account	Pensions
SC	All	\$53,375, or \$53,375 per spouse	\$4,275 & wildcard up to \$5350 of unused exemptions	\$5,350 & wildcard	\$1600 & wildcard	\$5,350 & wildcard	Yes
SD	80% or 40 x min. wage & \$25/dependent	Exempt	\$4,000, or \$6,000 head of hslid., wildcard	wildcard	wildcard	wildcard	Yes, up to \$1,000,000 private
TN	75% or 30 x min. wage & \$2.50/wk per dependent	\$5,000 for individual to \$50,000 if couple with child	\$10,000 wildcard	wildcard	\$1900	wildcard	Yes
TX	Exempt	exempt	\$30,000 individual, \$60,000 family wildcard	wildcard	wildcard	NA	Yes
UT	75% or 30 x min. wage	\$20,000 individual, \$40,000 couple	\$1500 + appliances, food, bed, bedding	\$2,500	\$3500	NA	Reasonably necessary
VT	85% or more if needed	\$125,000, TBE	\$2,500, wildcard up to \$7000, appliances, livestock	\$2,500	\$5000, \$5000 in crops	\$700, plus wildcard	To the extent needed.
VA	75% or 40 x min. wage	\$5,000 plus \$500 per dependant \$10,000 elder, TBE	\$5,000	\$6,000	\$10,000	NA	Yes
WA	75% or 30 x min. wage	\$125,000	\$6500, \$13,000 community, \$3000 wildcard, Not more than \$750/item	\$3250, \$6500 community	\$10,000 each farm, tools, prof. equipment	\$200 & \$1500 wildcard cash	Yes
WV	80% or 30 x min. wage	\$5000, in Bankruptcy \$25,000, \$50,000 joint	\$8,000 & \$800 wildcard + unused homestead	\$5,000	\$3,000	wildcard	Yes
WI	80% or fed. poverty amount	\$75,000 per spouse	\$12,000 wildcard per spouse	\$4,000 per spouse + wildcard	\$15,000	\$5000 per spouse	Yes
WY	75% or 30 x min. wage	\$10,000 per occupant	\$2,000 per person	\$2,400	\$2000	NA	Yes

Chart 3: BANKRUPTCY RATES AND WAGE GARNISHMENT PROTECTION

FY 2012		
State	Wage Garnishment Grade	Chap. 7 filings (per 1000)
AK	A	0.96
FL	A-	3.19
IA	A	1.98
MO	A-	3.26
NY	A-	1.85
NC	A	1.02
PA	A	1.61
SC	A	0.76
TX	A	0.83
AVERAGE		1.55
AZ	B-	3.91
DE	B	2.54
HI	B	1.46
MA	B	1.97
NE	B-	2.21
NJ	B	2.92
SD	B	1.76
VT	B	1.32
WV	B-	1.90
WI	B-	3.45
AVERAGE		2.34
AL	C	2.26
CA	C+	3.91
CO	C	4.39
CT	C	2.06
DC	C	1.20
GA	C	3.31
ID	C	3.69
IN	C	4.06
KS	C	2.10
KY	C	3.41
LA	C	1.24
ME	C	2.01
MD	C	3.28
MN	C	2.74
MS	C	2.23
MT	C	1.78
NC	C+	1.02
NV	C+	5.60
NH	C+	2.42
NM	C	2.11
ND	C+	1.36
OH	C	3.43
OK	C	2.67
OR	C	3.21
TN	C	3.18
UT	C	3.87
VA	C	2.43
WA	C	3.32
WY	C	1.94
AVERAGE		2.67
MI	D	4.34
RI	D	3.37
AVERAGE		3.86

FY 2011		
State	Wage Garnishment Grade	Chap. 7 filings (per 1000)
AK	A	1.21
FL	A-	3.96
IA	A	2.47
MO	A-	3.68
NY	A-	2.15
NC	A	1.27
PA	A	1.97
SC	A	0.88
TX	A	0.97
AVERAGE		1.86
AZ	B-	5.08
DE	B	2.83
HI	B	1.98
MA	B	2.41
NE	B-	2.73
NJ	B	3.52
SD	B	2.11
VT	B	1.62
WV	B-	2.39
WI	B-	3.91
AVERAGE		2.86
AL	C	2.62
CA	C+	4.93
CO	C	5.06
CT	C	2.54
DC	C	1.34
GA	C	3.87
ID	C	4.38
IN	C	4.70
KS	C	2.48
KY	C	3.84
LA	C	1.43
ME	C	2.45
MD	C	3.65
MN	C	3.18
MS	C	2.57
MT	C	2.28
NC	C+	1.27
NV	C+	7.34
NH	C+	2.98
NM	C	2.57
ND	C+	1.77
OH	C	4.03
OK	C	2.95
OR	C	3.70
TN	C	3.64
UT	C	4.48
VA	C	2.84
WA	C	3.74
WY	C	2.13
AVERAGE		3.16
MI	D	5.14
RI	D	4.13
AVERAGE		4.63