



H-1B and L-1A Compliance Review Site Visits

Fraud Detection National Security Compliance Review
Data (October 1, 2011, to September 30, 2015)

August 1, 2016

Fiscal Year 2016 Report to Congress



**Homeland
Security**

U.S. Citizenship and Immigration Services

Message from the Director

August 1, 2016

I am pleased to present the following report, “H-1B and L-1A Compliance Review Site Visits, Fraud Detection and National Security Compliance Review Data (October 1, 2011, to September 30, 2015),” prepared by U.S. Citizenship and Immigration Services (USCIS).

This report was compiled pursuant to language set forth in Senate Report 114-68, accompanying the *Fiscal Year 2016 Department of Homeland Security Appropriations Act* (P.L. 114-113).

Pursuant to congressional requirements, this report is being provided to the following Members of Congress:

The Honorable John R. Carter
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable John Hoeven
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jeanne Shaheen
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

I am pleased to respond to any questions you may have. Please do not hesitate to contact me at (202) 272-1000 or the Department’s Deputy Under Secretary for Management and Chief Financial Officer, Chip Fulghum, at (202) 447-5751.

Sincerely,



León Rodríguez
Director
U.S. Citizenship and Immigration Services



Executive Summary

This report responds to the Senate Appropriations Committee’s request for information on H-1B¹ and L-1A² compliance review site visits under the Administrative Site Visit and Verification Program.³ The report includes totals, localities, and outcomes of site visits, and the number of site visits that warranted referrals to U.S. Immigration and Customs Enforcement (ICE).

USCIS’s Fraud Detection and National Security (FDNS) Directorate conducts H-1B and L-1A site visits under the post-adjudication compliance review process.⁴ This report covers H-1B and L-1A site visits conducted from October 1, 2011, to September 30, 2015. During the past 4 years, FDNS conducted a total of 48,109 H-1B and 2,473 L-1A site visits.

The numbers of site visits conducted by each USCIS region are shown in the following table, along with the percentages of the total for each category.

Region	H-1B site visits	Percentage of total	L-1A site visits	Percentage of total
Central	13,866	29%	595	24%
Northeast	17,779	37%	1,152	46%
Southeast	6,502	13%	254	10%
Western	9,896	20%	468	19%
Undesignated locations*	66	-	4	-

* Because of the data extraction techniques and limitations, we were unable to confirm from the extracted data the worksite location for a small number of site visits.

¹ The H-1B nonimmigrant classification includes individuals coming temporarily to the United States to perform services in a specialty occupation, services of an exceptional nature relating to a Department of Defense cooperative research and development project, or services as a fashion model of distinguished merit or ability. See *Immigration and Nationality Act* § 101(a)(15)(H)(i)(b).

² An alien who, within 3 years preceding the time of his or her application for admission into the United States, has been employed continuously for 1 year by a firm or corporation or other legal entity or an affiliate or subsidiary thereof and who seeks to enter the United States temporarily in order to continue to render his or her services to the same employer, subsidiary, or affiliate thereof in a capacity that is managerial or executive.

³ Site visits based on suspicions of fraud are not considered compliance reviews but instead are considered targeted site visits. Targeted site visits are conducted during the course of a Fraud Detection and National Security Directorate’s administrative investigation resulting from suspicions of fraud.

⁴ The post-adjudication compliance review process consists of conducting site visits on randomly selected and approved H-1B and L-1A petitions.

Of the 48,109 H-1B site visits, 41,218 (86 percent) were determined to be compliant⁵ and 6,891 (14 percent) were determined to be noncompliant.⁶

Of the 2,473 L-1A site visits, 2,210 (89 percent) were determined to be compliant and 263 (11 percent) were determined to be noncompliant.

Cases deemed non-compliant are referred to the adjudications unit for further action, as appropriate.

Non-compliant site-visit results that indicate evidence of criminal misconduct, public safety threats, or national security concerns are elevated from “compliance review” status to “case” status and are pursued as administrative investigations. Those that rise to the level of criminal investigation are referred to ICE.

Of the 7,154 H-1B and L-1A site visits that were deemed noncompliant, 13 compliance reviews were referred to ICE.

⁵ Compliant means that the petitioner and the beneficiary are not in violation of the terms of the petition.

⁶ Noncompliant refers to the petitioner being in violation of the terms of the petition or the beneficiary being in violation of the terms of the visa classification.



H-1B and L-1A Compliance Review Site Visits Fraud Detection and National Security Compliance Review Data (October 1, 2011, to September 30, 2015)

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I. Legislative Language

This document has been compiled in response to language in Senate Report 114-68, accompanying the *Fiscal Year (FY) 2016 Department of Homeland Security (DHS) Appropriations Act* (P.L. 114-113).

Senate Report 114-68 includes the following:

Within 90 days of the enactment of this act, the Committee directs USCIS to report on how many H-1B and L compliance review site visits have been conducted over the past four 4 years, as a percentage of total of active petitioners and visa beneficiaries, including the localities in which the visits have been performed, the outcomes of the site visits, including when petitioners or beneficiaries have requested that the review be terminated, and when cases were referred to ICE.

II. Background

U.S. Citizenship and Immigration Services (USCIS) adjudicates various employment-based immigration benefit requests, including petitions for nonimmigrant workers. Through the Administrative Site Visit and Verification Program (ASVVP), the USCIS Fraud Detection and National Security (FDNS) Directorate performs administrative site visits and other informational verifications on specific petitions and applications for immigration benefits. The timing of site visits and other informational verifications vary dependent on the petition or application.

ASVVP was implemented in July 2009 on the basis of findings from the Benefit Fraud and Compliance Assessment process, which recommended that physical site inspections would be a valuable fraud detection tool. The program relies on site visits to verify information provided to USCIS in support of nonimmigrant or immigrant visa petitions. Administrative site visits are performed at various types of work locations.

Under ASVVP, FDNS conducts unannounced pre- and post-adjudication site visits on various immigration classifications to verify information contained in certain visa petitions as part of a compliance review. For the H-1B and L-1A classifications, the site visits are conducted post-adjudication. The verification process is designed to assess whether petitioners and beneficiaries are in compliance with applicable immigration laws and regulations. This process includes review of public records and information, review of the petition and the accompanying evidence, interviews with the petitioner and beneficiary, and site visit findings. Compliance review verification may include follow up with the petitioner and/or beneficiary by phone and email.

Participation by the petitioner and/or beneficiary during a site visit is voluntary. At any time, the petitioner and/or the beneficiary may indicate his or her unwillingness to participate in the site visit. In such instances, the site inspector will terminate the site visit, complete his or her report, and indicate that the site visit was terminated at the request of the petitioner or beneficiary.

Since 2009, ASVVP has proven to be a critical tool in verifying compliance with applicable immigration laws and regulations that govern certain employment-based visa categories. Initial implementation focused on verification of compliance for H-1B petition approvals. The H-1B nonimmigrant classification enables U.S. employers to hire foreign workers meeting specific qualifications to work in the United States.

During FY 2014, ASVVP compliance review site visits were extended to include the L-1A Intracompany Transferee classification. The L-1A Intracompany Transferee classification enables a U.S. employer to transfer an executive or manager from one of its

affiliated foreign offices to one of its U.S. offices. This classification also enables a foreign company that does not yet have an affiliated U.S. office to send an executive or manager to the United States with the purpose of establishing a new office.

III. Compliance Review Data Report

Senate Report 114-68, accompanying the *FY 2016 DHS Appropriations Act* (P.L. 114-113), specifically requested data reports regarding the performance of ASVVP from the past 4 years. In response, USCIS compiled relevant data from October 1, 2011, to September 30, 2015. This report encompasses an analysis and discussion of the requested data.

Analysis/Discussion

A. H-1B and L-1A compliance review site visits that have been conducted over the past 4 years

For the purposes of this report, this analysis is based on understanding that the Senate language, “*have been conducted*,” relates to site visits that have been completed during the requested reporting period. This is consistent with the request for USCIS to provide information on the outcomes of site visits that have been conducted. Pending site visits as of September 30, 2015, whether pending final review and completion or follow-up administrative actions, are not included in this report because those completions will be counted toward completed site visits for FY 2016. The analysis also excludes the compliance reviews with a substatus of “No Site Check Conducted” because those visits were either canceled or waived. Site visits can be canceled for reasons such as withdrawal of the petition, beneficiary’s adjustment of status to lawful permanent residence, an active investigation, or officer safety concerns. Site visits can be waived on the basis of a determination by the supervisory immigration officer.

Table 1

<i>H-1B and L-1A Compliance Review Site Visits Completed in FY 2012 to FY 2015</i>					
Compliance Review Type	2012	2013	2014	2015	Totals
H-1B	23,451	9,060	10,658	4,940	48,109
L-1A			487	1,986	2,473
Totals	23,451	9,060	11,145	6,926	50,582

Source: FDNS Data System (FDNS-DS), October 2015

Note: Excludes substatus of “No Site Check Conducted”

In August 2013, the Office of Inspector General released OIG-13-107, *Implementation of L-1 Visa Regulations*. That report recommended establishing a site visit requirement for L-1A nonimmigrants before the filing of petitions on their behalf to extend the initial period of stay of 1 year granted to L-1A nonimmigrants admitted to the United States to

open or be employed in a new office⁷ in the United States. USCIS fully concurred with this recommendation, and FDNS subsequently incorporated L-1A compliance reviews into the ASVVP during FY 2014. The L-1A pilot program's first year lasted from July 1, 2014, through June 30, 2015, and L-1A site visits were fully integrated into ASVVP as a permanent program starting the last quarter of FY 2014.

The ASVVP completed the transition from use of contractor site inspectors to assigning site visits exclusively to FDNS immigration officers (IO1) GS 5/7/9 during FY 2014. High vacancy rates for IO1s occurred after the transition because many IO1s began to pursue promotions in other USCIS positions. The high attrition rate affected the performance numbers for FY 2015. The ASVVP is examining the possibility of having an open hiring announcement for IO1s to allow a faster turnaround to fill these positions as they become vacant.

During FY 2015, USCIS updated the ASVVP standard operating procedures (SOP) and FDNS-DS User Guide to reflect the most recent operational updates and to help FDNS IO1s properly prepare, perform, and document their compliance review assignments. The updated procedures also reflect ASVVP's transition to setting hard-target completion goals to manage workloads on the basis of current office capacity and available resources.

B. H-1B and L-1A compliance reviews completed over the past 4 fiscal years as a percentage of total active petitioners and visa beneficiaries

Employers use Form I-129, Petition for a Nonimmigrant Worker,⁸ to petition USCIS for a foreign national to come temporarily to the United States as a nonimmigrant to perform services or labor, or to receive training. Each Form I-129 pertaining to the H-1B or L-1A nonimmigrant classifications identifies one petitioner and one beneficiary per petition. Therefore, the number of petitions filed in a fiscal year was used to determine the number of "total active petitioners/beneficiaries" for a fiscal year in the table below. However, a particular site visit might or might not take place within the same fiscal year that the corresponding petition was filed. Additionally, under the ASVVP SOP, an officer may waive a site visit if the record shows that a work location for a petitioner was subject to a site visit within the last 2 years.

⁷ "New office" means an organization that has been doing business in the United States through a parent, branch, affiliate, or subsidiary for less than 1 year, 8 CFR 214.2(l)(1)(ii)(F). New office petitions may be approved for a period not to exceed 1 year, 8 CFR 214.2(l)(7)(i)(A)(3). Evidentiary requirements specific to new office petitions filed on behalf of L-1A nonimmigrant managers or executives are found at 8 CFR 214.2(l)(2)(v).

⁸ Available at <https://www.uscis.gov/i-129>

Table 2

<i>H-1B and L-1A Compliance Review Site Visits as Percentage of Total Active Petitioners/Beneficiaries</i>					
Compliance Review Type	2012	2013	2014	2015	Totals
H-1B	23,451	9,060	10,658	4,940	48,109
Total Active Petitioners/Beneficiaries	308,545	300,011	326,305	369,049	1,303,910
<i>Percent to Active</i>	7.60%	3.02%	3.27%	1.34%	3.69%

Compliance Review Type	2012	2013	2014	2015	Totals
L-1A	-	-	487	1,986	2,473
Total Active Petitioners/Beneficiaries	-	-	25,528	26,553	52,081
<i>Percent to Active</i>	-	-	1.91%	7.48%	4.75%

Source: FDNS-DS, October 2015; Office of Performance and Quality, November 2015.

During the October 1, 2011, to September 30, 2015, reporting period, the cumulative total of H-1B petitions filed amounted to 1,303,910. FDNS conducted a total of 48,109 H-1B site visits for the same reporting period, which accounts for 3.69 percent of the total active H-1B petitioners and beneficiaries.

In FY 2014, FDNS started conducting site visits on L-1A petitions. During FY 2014 and FY 2015, the cumulative total of L-1A petitions filed amounted to 52,081. FDNS conducted a total of 2,473 L-1A site visits for the same reporting period, which accounts for 4.75 percent of the total active L-1A petitioners and beneficiaries.

C. Localities in which the site visits have been performed⁹

In FY 2012, ASVVP made significant improvements in the efficiency of the compliance review process through the development of a new workload distribution methodology by FDNS, in cooperation with the Service Center Operations Directorate and the Field Operations Directorate (FOD). The goal was to shift ASVVP workflow management from the Service Center Fraud Detection Operations Units (CFDO) to the FOD regional offices. Under this initiative, the regional analysts were able to request ASVVP assignments based on their field office's capacity and assignment needs.

On the basis of FOD regional office requests, once the eligible pool for site visits is selected randomly, the CFDOs initiate the ASVVP process and distribute the compliance

⁹ Site visit data were aggregated at the regional level on the basis of the state within the jurisdiction of the region, which may be different from the field office performing the site visit. Site visit assignments are managed at the regional levels, which may involve several field offices within the region working as a team to absorb the pending regional workload. Site visit completions are accredited to the field office conducting the site visit and not to the field office having jurisdiction over the location of the site visit.

reviews to the regional offices. There are four regional offices overseeing the ASVVP process: Central Regional Office (CRO), Northeast Regional Office (NER), Southeast Regional Office (SER), and the Western Regional Office (WRO). The regional offices oversee the site visit processes at the field level and report the results back to the CFDOS for final evaluation and determination of the compliance reviews.¹⁰

Table 3 illustrates H-1B compliance review site visits by regional office to beneficiary worksite address: FY 2012 to FY 2015.

Table 3

<i>H-1B Compliance Review Site Visits by Regional Office Based on Beneficiary Worksite Address: FY 2012 to FY 2015¹¹</i>					
Region	2012	2013	2014	2015	Totals
Central	6,096	2,760	3,119	1,891	13,866
Northeast	9,160	3,237	3,900	1,482	17,779
Southeast	3,063	1,148	1,601	690	6,502
Western	5,099	1,899	2,026	872	9,896
Undesignated location*	33	16	12	5	66
Totals	23,451	9,060	10,658	4,940	48,109

* Because of the data extraction techniques to identify address information, the beneficiary worksite address was unable to be pulled for a small number of site visits.

Source: FDNS-DS, November 2015.

The CRO conducted 13,866 H-1B site visits during the reporting period, which accounts for 28.82 percent of the total H-1B site visits conducted under ASVVP for the same reporting period.

The NER conducted 17,779 H-1B site visits during the reporting period, which accounts for 36.95 percent of the total H-1B site visits conducted under ASVVP for the same reporting period.

The SER conducted 6,502 H-1B site visits during the reporting period, which accounts for 13.51 percent of the total H-1B site visits conducted under ASVVP for the same reporting period.

¹⁰ The results exclude site visits with a status of “No Site Check Conducted” and site visits that were missing receipt numbers. The results include the most recent worksite addresses where the petitions and supporting documents indicate that the beneficiaries are performing H-1B or L-1A duties.

¹¹ Site visit data were aggregated at the regional level on the basis of the state within the jurisdiction of the region, which may be different from the FDNS field office performing the site visit.

The WRO conducted 9,896 H-1B site visits during the reporting period, which accounts for 20.57 percent of the total H-1B site visits conducted under ASVVP for the same reporting period.

Table 4

<i>L-1A Compliance Review Site Visits by Regional Office based on Beneficiary Worksite Address: FY 2012 to FY 2015¹²</i>					
	2012	2013	2014	2015	Totals
Central	-	-	95	500	595
Northeast	-	-	299	853	1,152
Southeast	-	-	42	212	254
Western	-	-	51	417	468
Undesignated location*	-	-	-	4	4
Totals	-	-	487	1,986	2,473

* Because of the data extraction techniques to identify address information, the beneficiary worksite address was unable to be pulled for a small number of site visits.

Source: FDNS-DS, November 2015.

The CRO conducted 595 L-1A site visits during the reporting period, FY 2012 to FY 2015, which accounts for 24.06 percent of the total L-1A site visits conducted under ASVVP for the same reporting period.

The NER conducted 1,152 L-1A site visits during the reporting period, FY 2012 to FY 2015, which accounts for 46.58 percent of the total L-1A site visits conducted under ASVVP for the same reporting period.

The SER conducted 254 L-1A site visits during the reporting period, FY 2012 to FY 2015, which accounts for 10.27 percent of the total L-1A site visits conducted under ASVVP for the same reporting period.

The WRO conducted 468 L-1A site visits during the reporting period, FY 2012 to FY 2015, which accounts for 18.92 percent of the total L-1A site visits conducted under ASVVP for the same reporting period.

D. Outcomes of the site visits

The objective of a site visit includes verifying whether the beneficiary is working in the location, being paid the salary, and performing the duties indicated on the petition. The CFDO reviews the compliance review report and makes a determination of “Compliant”

¹² Site visit data were aggregated at the region level on the basis of the state within the jurisdiction of the region, which may be different from the FDNS regional office performing the site visit.

or “Noncompliant” on the basis of the results of the site visit and any additional derogatory information gathered during the final review:

- Compliant – the petitioner and beneficiary are not in violation of the terms of the petition.
- Noncompliant – the petitioner is in violation of the terms of the petition or the beneficiary is in violation of the terms of the visa classification.

Although compliance reviews do not directly target fraud, these verifications enable USCIS to identify fraud schemes that were not identifiable in the past.

Table 5

<i>Outcomes of H-1B and L-1A Compliance Review Site Visits: FY 2012 to FY 2015</i>					
Type and Outcome	2012	2013	2014	2015	Totals
<i>H-1B</i>					
Compliant	19,658	7,706	9,429	4,425	41,218
Noncompliant	3,793	1,354	1,229	515	6,891
Total	23,451	9,060	10,658	4,940	48,109
<i>L-1A</i>					
Compliant	-	-	428	1,782	2,210
Noncompliant	-	-	59	204	263
Total	-	-	487	1,986	2,473

Notes: Excludes substatus of “No Site Check Conducted.”

Source: FDNS-DS, October 2015.

In instances where a site visit is deemed noncompliant, the CFDO will review the results of the site visit and assess the derogatory information for any fraud indicators. When the CFDO concludes that there are no substantive and articulable fraud indicators but the petition is deemed noncompliant, the petition is routed to an adjudicating officer for review and processing of any follow-ups or warranted adverse action. As necessary, the CFDO will work with the adjudications officer to resolve any outstanding issues or pursue any adverse actions.¹³ Conversely, when the CFDO concludes that there are substantive and articulable fraud indicators, the petition is referred to ICE for investigation and possible prosecution. See Section F below.

For the purpose of this report, compliance reviews with a substatus of “*No Site Check Conducted*” were excluded because this substatus pertaining to H-1B and L-1A compliance reviews does not translate to substantive noncompliance information. All other substatures indicate that either the petitioners are not compliant with the terms of the petitions or the beneficiaries are in violation of the terms of their visa classification.

¹³ Depending on the “noncompliant” information, an adjudications officer may pursue issuance of a Request for Evidence, a Notice of Intent to Deny, or a Notice of Intent to Revoke a petition.

During the reporting period of October 1, 2011, to September 30, 2015, ASVVP completed 48,109 H-1B site visits: 41,218 compliance reviews (86 percent) were compliant, while 6,891 compliance reviews (14 percent) were noncompliant.

ASVVP also completed 2,473 L-1A site visits: 2,210 compliance reviews (89 percent) were compliant, while 263 compliance reviews (11 percent) were noncompliant.

E. Outcomes of the site visits indicating when the petitioner or the beneficiary requested to terminate the interview

ASVVP site visits are selected randomly. The primary purpose of ASVVP is to verify information provided by a petitioner or a beneficiary in a structured, nonfraud-based referral. ASVVP site visits are unannounced and participation by the petitioner and beneficiary is voluntary. In cases where the petitioner, the beneficiary, or both are unwilling to participate, the officer terminates the site visit and indicates on the report that the site visit was terminated at the petitioner or beneficiary's request. Such unwillingness may lead to other USCIS follow-up actions (e.g., issuance of a Request for Evidence, a Notice of Intent to Deny, or a Notice of Intent to Revoke a petition).

Data on terminated site visits due to the petitioner or beneficiary's request to terminate is not recorded consistently in FDNS-DS and, therefore, cannot be reported. FDNS plans to explore potential system upgrades to capture this information in FY 2016.

F. Referrals to ICE

In cases where the CFDO determines that substantive and clearly articulable fraud indicators exist, FDNS immigration officers will perform an administrative fraud investigation as well as identify violations of section 212(a)(6)(C)(i) of the *Immigration and Nationality Act* and/or any other grounds of inadmissibility or removability.

During the administrative investigation, FDNS may uncover evidence of criminal misconduct, public safety threats, or national security concerns. In those instances, FDNS refers the case to ICE or notifies other government agencies as appropriate. If a case is referred to another agency for criminal investigation or prosecution and it is declined, FDNS still will pursue the administrative investigation that may lead to the denial or revocation of an immigration benefit and/or initiation of removal proceedings.

A total of 13 referrals to ICE were made between FY 2012 to 2015 as a direct result of H-1B or L-1A ASVVP compliance reviews.

IV. Conclusion/Prospective Plans

To ensure compliance in select visa petitions, USCIS implemented ASVVP in 2009 authorizing FDNS to conduct unannounced site visits on randomly selected H-1B visa petitions. Randomly selected L-1A visa petitions were added in FY 2014. Between FY 2012 and FY 2015, FDNS completed 50,582 ASVVP site visits, of which 43,428 (86 percent) compliance reviews were deemed compliant, while 7,154 (14 percent) were found to be noncompliant.

Cases deemed noncompliant are referred to the adjudications unit for further action, as appropriate.

Non-compliant site visit results that indicate evidence of criminal misconduct, public safety threats, or national security concerns are elevated from “compliance review” status to “case” status and are pursued as administrative investigations. Those that rise to the level of criminal investigation are referred to ICE.

ASVVP compliance reviews play an integral role in USCIS’s fraud deterrence efforts by verifying that H-1B and L-1A visa petition requirements are met, thereby enhancing the integrity of the legal immigration system.

Appendix

Abbreviation	Explanation
ASVVP	Administrative Site Visit and Verification Program
CFDO	Center Fraud Detection Operations
CRO	Central Region Office
DHS	Department of Homeland Security
FDNS	Fraud Detection and National Security
FDNS-DS	Fraud Detection and National Security Data System
FOD	Field Operations Directorate
FY	Fiscal Year
ICE	U.S. Immigration and Customs Enforcement
IO1	FDNS Immigration Officer
NER	Northeast Region
SER	Southeast Region
SOP	standard operating procedure
USCIS	U.S. Citizenship and Immigration Services
WRO	Western Region Office

Regional Jurisdictions by State			
Central	Northeast	Southeast	Western
CO	CT	AL	AK
IA	DC	AR	AZ
ID	DE	FL	CA
IL	MA	GA	GU
IN	MD	LA	HI
KS	ME	MS	MT
KY	NH	NC	NV
MI	NJ	PR	OR
MN	NY	SC	WA
MO	PA	TN	
ND	RI	VI	
NE	VA		
NM	VT		
OH	WV		
OK			
SD			
TX			
UT			
WI			
WY			