## **BOARD OF HIGHER EDUCATION**

#### REQUEST FOR COMMITTEE AND BOARD ACTION

**COMMITTEE**: Academic Affairs **NO**.: AAC 12-38

**COMMITTEE DATE:** June 12, 2012

BOARD DATE: June 19, 2012

## APPLICATION OF BRISTOL COMMUNITY COLLEGE TO AWARD THE ASSOCIATE IN SCIENCE IN PARALEGAL STUDIES

**MOVED**: The Board of Higher Education hereby approves the application of

Bristol Community College to award the Associate in Science in

Paralegal Studies.

Upon graduating the first class for this program, the College shall submit to the Board a status report addressing its success in reaching

program goals as stated in the application and in the areas of

enrollment, curriculum, faculty resources, and program effectiveness.

Authority: Massachusetts General Laws Chapter 15A, Section 9(b)

Contact: Dr. Francesca Purcell

Associate Commissioner for Academic and P-16 Policy

## **BOARD OF HIGHER EDUCATION**

June 2012

# Bristol Community College Associate in Science in Paralegal Studies

#### INTENT AND MISSION

Bristol Community College (BCC) filed an expedited application to offer the Associate in Science in Paralegal Studies. The proposed Paralegal Studies Program intends to combine a Liberal Arts foundation with a career concentration providing students with the opportunity to explore the field of law and gain marketable skills to perform a wide range of supportive legal functions. Graduates will be able to work in a general legal practice or specialize in corporate work, real estate, probate, criminal and/or civil litigation, or other legal specialties. Students in this program will gain valuable work experience by participating in an internship. The proposed program builds upon BCC's currently-offered Paralegal Certificate Program through which BCC has already placed students at more than 20 internship sites, in such varied locations as the District Attorney's Office, private law firms, and legal services.

The program was developed to meet the American Bar Association (ABA) guidelines with the goal of applying for and receiving accreditation. Submission to the ABA for accreditation takes place following the completion of the second year of the program. To that end, the College will apply during the spring semester of the second year of operation.

BCC's mission statement includes the goal *to provide programs that nurture the region's* economic health and well-being and enable individuals to make productive life choices. In the review and planning process for this proposal, BCC found that there are few accredited programs in the region that offer a Paralegal degree and that there is a current and anticipated need in the region from employers. In creating this program it is BCC's intention that residents of Southeastern Massachusetts will be able to complete an accredited program in Paralegal Studies that will afford them a career with a living wage.

The proposed program was approved by BCC's internal governance procedures and was approved by the Board of Trustees on May 2, 2011. The letter of intent was circulated on May 7, 2012. One response was received from UMASS-Dartmouth noting that the College had inadvertently listed the old law school name (Southern New England School of Law).

#### **NEED AND DEMAND**

According to BCC, the Bureau of Labor Statistics reports Paralegals to be number nineteen on the list of the fifty fastest growing careers. At present, there are 8,030 Paralegals employed in Massachusetts. The Bureau of Labor Statistics Data suggests that Massachusetts alone will have 250 average annual openings for Paralegals through the year 2016 and that this profession will grow by 23% in the next few years.

BCC's Division of Business and Information Management, along with the Office of Institutional Research, Planning, and Assessment, conducted an online survey to determine interest in a potential Paralegal Program at Bristol Community College in spring 2009. The survey was advertised on the BCC website and was made available to any visitor to the homepage. Participants were asked about their interest in the program, their preferences for when it would begin, and the time period and location for attending classes. Respondents were also asked to provide any questions or comments they had, and could leave contact information if they were interested in learning more about the program. In total,151 responses were collected.

Most respondents were current students (80%), followed by community members (11%), and soon-to-be students (9%). Most indicated that they would be interested in enrolling in the program at some point (68%), primarily preferring a January start date; however, some respondents also expressed interest in beginning the program in September or June. Some participants (22%) reported that they were unsure about interest in the program and a remaining 10% said they would not be interested in enrolling. Those who indicated being interested in the program were asked to identify the best time period and location for attending classes and were asked to select all that applied. Weeknights and online/hybrid courses garnered the most interest (76 and 73 responses respectively) and weekdays (before 4 p.m.) received 66 responses. Classes on the weekends earned the least amount of support with only 48 people selecting this option. In terms of where courses should be held, respondents overwhelmingly supported holding classes in Fall River (118 responses), followed by New Bedford (33 responses), Attleboro (28 responses), and Taunton (18 responses). Participants were asked to indicate where they would consider working upon graduation. Again, respondents were allowed to select all options that applied, as well as providing their own "Other" response. Most indicated that they would work in Fall River (101 responses), Providence (83 responses), or New Bedford (70 responses). Write-in responses were varied; however a number of people reported that they would be interested in working in Taunton (9 responses).

Additionally, BCC's Career Center contacted fifty nearby law offices in Massachusetts, Rhode Island, and Connecticut to further ascertain regional need. BCC also contacted both Liberty Mutual and Citi Financial Services which are representative of large companies which hire paralegals. From these discussions, BCC concluded that both law firms as well as other industries will continue to regularly seek out and hire paralegals in the southeastern region for the foreseeable future.

According to BCC, there is very little competition for Paralegal Studies in Southeastern Massachusetts. The nearest community colleges with programs are Bunker Hill Community College, North Shore and Northern Essex. Private colleges include Roger Williams University in Rhode Island, and Suffolk University and Bay Path College in Massachusetts – all of which are a significant distance from BCC. Students participating in Mass Colleges Online can complete an Associate's Degree in Paralegal Studies. While a virtual degree is the right option for many students, not all learners are well-suited for success in a 100% online degree program.

## **ACADEMIC AND RELATED MATTERS**

#### Admission and Enrollment

Requirements for admission will follow the College's guidelines as stated in the BCC Catalog (evidence of a high school diploma or equivalent). Massachusetts residents will be required to achieve a passing score on the MCAS exam. Students completing 15 credits per semester (full-time) will be able to complete the program in two years. Those students who require additional remedial coursework in Math, Reading and English will require additional time for degree completion.

## PROGRAM ENROLLMENT PROJECTION

	# of Students Year 1*	# of Students Year 2	# of Students Year 3	# of Students Year 4*
New Full Time	8	10	12	14
Continuing Full Time	0	5	13	17
New Part Time	12	15	18	21
Continuing Part Time	0	5	15	28
Totals	20	36	61	92

## Curriculum (Appendix A)

Students will be required to complete 60-61 credits. Paralegal courses will make 30 credits; Legal Administration courses will make up six credits, and the remaining 24 or 25 credits will make up general education courses. Additionally students will have the opportunity for elective credits in other specialties such as Immigration Law. Paralegal Studies students in good academic standing will also be afforded the opportunity of an internship to further develop their skills, and to provide them with direct, hands-on experience in their field. The curriculum will emphasize the development of students' analytical, critical thinking, and written and oral communication skills. Upon completion of the program, graduates will possess the integral skills needed to work effectively in a modern legal environment.

## Student Learning Outcomes

The College's General Education Learning Outcomes seek to ensure that graduates of the Paralegal Program will possess critical analysis, communication, technical and multicultural skills. The BCC "Educated Person" is one who has developed significant skill in reading, writing and mathematical analysis, with a demonstrated awareness of history, social issues and the role of language, literature, science and the arts in creating a just and fair society.

## Paralegal Learning Outcomes

Students will be able to determine ethical conduct in a variety of legal situations.

Students will be able to plan a strategy to organize and conduct basic legal research and cite-checking using print and electronic resources.

Students will be able to draft common legal documents in core course areas.

Students will be able to use at an introductory level some of the common software specific to legal offices for legal research, legal case management, time and billing, etc.

Students will be able to conduct a client and witness interview, manage documents in trials, real estate closings, probate hearings, etc.

Students will possess the skills needed for paralegal employment.

## General Education Learning Outcomes

#### Critical Analysis (1.0): Students will develop the ability to:

- 1. Identify and summarize the problem/question at issue (and/or the source's position)
- 2. State their own perspectives and positions as they relate to analyses of the problem/question at issue 3. Identify and explain others' salient perspectives and positions important to the problem/question at issue
- 4. Identify and assess the key assumptions that underlie the issue or position
- 5. Identify and assess the quality of supporting data/evidence and provide additional relevant data
- 6. Identify and describe the influence of context on the problem/question at issue
- 7. Identify and assess conclusions, implications, and consequence

#### Written Communication (2.1) Students will develop the ability to:

- 1. Use language that is precise, clear, and reflective of standard, academic English
- 2. Use written English in contextually appropriate ways, according to audience, purpose, and setting
  3. Organize information and critical thought into coherent and unified documents, using appropriate formats
- 4. Select, evaluate, incorporate and document research effectively and ethically

## Oral Communication (2.2) As speakers, students will develop the ability to:

- 1. Articulate and promote ideas in a clear, organized manner that demonstrates critical analysis skills
- 2. Use language that is appropriate within and across cultures to address diverse audiences
- 3. Demonstrate nonverbal behavior that supports the verbal message
- 4. Employ media and technology if appropriate to the communication context
- 5. As active listeners, students will develop the ability to:
- 6. Maintain focus on the speaker's verbal and nonverbal messages
- 7. Listen respectfully and critically
- 8. Provide feedback based on interpretation and evaluation of the message

## Scientific Reasoning and Discovery (3.0) Students will develop the ability to:

- 1. Apply the scientific method as used in the traditional sciences
- 2. Use basic scientific information as the foundation for the analysis of evidence and the methodology of scientific inquiry
- 3. Analyze critically science-based issues in contemporary society (scientific literacy)

## Quantitative and Symbolic Reasoning (4.0) Students will develop the

## ability to:

- 1. Use deductive thinking to solve mathematical problems and to determine the reasonableness of their results
- 2. Use a variety of problem solving strategies that exhibit logical thinking
- 3. Communicate findings both in writing and orally using supportive mathematical language and symbolism with supporting
- 4. Identify, understand and engage in mathematics as well as make well-founded mathematical judgments as a constructive, concerned, reflective citizen (quantitative literacy)

#### Historic Awareness (5.1) Students will develop the ability to:

- 1. Use historical factual information to understand the current world
- 2. Explain how values, belief systems, and institutions have evolved over time, and their significance and relationship to each other
- 3. Explain connections between human behaviors and consequences

#### Global Awareness (5.2) Students will develop the ability to:

- 1. Describe varied perspectives concerning current global issues.
- 2. Discuss issues from a global perspective rather than from a particular cultural perspective
- 3. Explain the connections between historical and recent events and current global situations
- 4. Explain the complex forces, divergent views and dynamics that contribute to modern world conditions

#### Multicultural Perspective (5.3) Students will develop the ability to:

- 1. Interact across cultures by exhibiting understanding of and respect for the beliefs, values, traditions, and practices of people from other cultures
- 2. Recognize and articulate the different assumptions, beliefs and perspectives of people from different cultural backgrounds

3. Appraise the impact of other cultures on the development of one's own ideas and beliefs

#### Multicultural Perspective (5.3) (continued) Students will develop the ability to:

- 4. Explain the social and historical circumstances that form the basis of the beliefs, experiences and actions of culturally diverse groups
- 5. Demonstrate how differences in race, gender, religion, ethnicity, social class, disability, sexual orientation, and linguistic background contribute to the pervasive realities of stereotyping and discrimination

#### Social Phenomenon (5.4) Students will develop the ability to:

- 1. Describe forms of human interaction (social, political, economic, professional, personal and environmental)
- 2. Describe how individuals interact among groups
- 3. Explain principles of group behavior and social organizations and how power is wielded in society
- 4. Identify the responsibilities and rights of the individual -in human society

#### Humanities (6.0) Students will develop the ability to:

- 1. Appraise the philosophical, literary, aesthetic, and/or cultural contributions and expressions of human beings
- 2. Think critically and imaginatively about the human experience as it applies to their own experiences
- 3. Create, interpret and/or evaluate visual, verbal, and artistic communication
- 4. Utilize a rigorous, systematic approach to the exploration of the value, purpose, and meaning of the human condition

#### Ethical Dimensions (7.0) Students will develop the ability to:

- 1. Evaluate differing points of view on the same issue
- 2. Explain the evolution of the concepts of right and wrong
- 3. Apply concepts of justice and fairness
- 4. Explain the value of good citizenship
- 5. Apply the standards for judging human behavior
- 6. Explain the importance of considering the ramifications of decisions

#### Technical Literacy (8.0) Students will develop the ability to:

- 1. Demonstrate basic familiarity with hardware and software
- 2. Use the Internet for research and communication
- 3. Navigate an operating system
- 4. Identify and apply appropriate software packages to solve real-world problems.

## **RESOURCES AND BUDGET**

## Faculty and Administration

The program will reside in the Division of Behavioral and Social Sciences as part of a proposed Legal Studies Department that would offer coursework in Government and Politics. The current Program Coordinator has a significant background in Paralegal work and has served as the college's Program Coordinator for Office Administration – Legal Administrative Assistant. A second full-time faculty member has a Juris Doctorate degree with many years in the profession, including experience supervising Paralegals. He is willing to serve as Program Chairperson upon ABA Accreditation. The Paralegal Studies Program Coordinator will report to the Dean for Behavioral and Social Sciences. Appropriate faculty members with Law and Paralegal degrees have been consulted regarding course development and potential teaching commitments pending approval of the program. ABA standards require that the paralegal courses be taught by attorneys. Bristol Community College has fifteen adjunct faculty and professional staff who hold the Juris Doctor degree from whom to draw upon for this program.

An advisory board will be established to ensure that the program consistently meets or exceeds ABA guidelines, to review curriculum and course sequencing, as well as provide some oversight regarding student internships. The Advisory Board members will be from area firms that employ paralegals who will be appointed to serve for one year, with the option to renew. The Program Coordinator for Paralegal Studies will chair the Advisory Board and convene with them no less than once per semester, and as needed.

#### Library and Information Technology

The Learning Resources Center (LRC) maintains several products from West Law. The LRC currently maintains the West campus data base used by BCC's Criminal Justice students and faculty. West campus is a campus research service powered by Westlaw

and designed for the needs of librarians and college students. The LRC also maintains a large print collection from West. Some of the resources available on West Campus research are:

- News databases arranged geographically and topically
- Hundreds of newspapers, newswires, magazines. and broadcast transcripts (Reuters)
- Business, trade and professional journals, including Harvard Law Review and Yale Law Review
- Federal and State case law, including cases from the U.S. Supreme Court
- Full text of the United States code Annotated (USCA) and code of Federal Regulations (CFR)

This is a database that is available 24/7 to all BCC students and Faculty/Staff (remote access with valid BCC Access library card).

The LRC maintains a large Print Collection of resources that is currently used by Criminal Justice students, but will also serve students in the Paralegal Program. Resources available in the Print Collection include:

- MA Decisions
- MA Digest
- MA General Laws
- MA Legislative Service
- MA Sessions Law
- Supreme Court Reporter
- Supreme Court Reporter Interim
- Supreme Court Digest
- United States Code Annotated (USCA)
- IS Congressional News
- West Analysis American Law
- Federal Civil and Judicial Procedure & rules
- Legal Lists pamphlet
- MA Court Rules State and Federal

The College will continue to increase its LRC holdings to meet ABA guidelines.

#### Budget (Appendix B)

The Program Coordinator for this proposal is already a full-time, tenured faculty who will assume the duties of both the Legal Administrative Assistant Degree and Law Office Assistant Certificate and the new Paralegal Degree Program. She will be one of two, full-time faculty devoted to this program until enrollment growth and accreditation guidelines warrants another full-time instructor. The remainder of the Paralegal classes will be taught by existing adjunct faculty whose salary range is consistent with the contract (approximately \$2,600 to \$3,000 for a 3-credit course).

Revenue costs will be based on an initial enrollment of 20 students, with a modest

predicted enrollment growth of 5% each year. Based on a four-year projected budget, the College will only operate at a small loss for the first year, with significant and increasing revenues in all subsequent years.

There will be no equipment or clinical expenses associated with this program, and the Paralegal Internship will be run through the College's existing Co-op program. The Program Coordinator will provide direct oversight and evaluation of all internship sites.

There will be costs associated with increasing the LRC holdings to support Paralegal students and faculty.

#### **Facilities**

There are no lab or equipment requirements for this program. The College maintains sufficient classroom and computer resources to offer the full program in traditional face-to-face lectures, hybrid and online classrooms.

## **PROGRAM EFFECTIVENESS**

Program Effectiveness Goals	General strategies to achieve the goals	Tools to measure the goals' achievement
Graduates of the Associate Degree program will have a 75% job placement within six months of graduation.	Despite a sluggish economy, the Job Outlook for Paralegals and Legal Assistants are projected to see an 18% growth in job opportunities over this decade.  Since internships and work experience are embedded in the program, graduates will have a significant advantage in securing employment after graduation, further, as the College moves towards American Bar Association Accreditation, graduates will have an additional advantage in employment seeking.	Employment status will be measured in two ways. First, the College's Annual Perkins Survey for graduates in technical programs will provide data on job placement, transfer and salary for graduates. Secondly, the Program Coordinator will survey all graduates regarding job placement and transfer.
It is expected that 20% of graduates of the program will continue at a Baccalaureate awarding institution.	Discussions with Roger Williams University and Elms College are in progress to formalize articulation/transfer agreements between BCC and these institutions. RWU will be finalized prior to Elms College since Elms will only accept credit from an ABA-accredited program.	The Coordinator of Transfer Affairs will provide data on this outcome annually.
The program seeks to recruit and enroll at least 40 students annually, with at least 40% of the student population graduating within three years of matriculation.	Recruitment activities will include outreach to high schools and law organizations. College personnel will work to provide students with support services to ensure success.	In addition to Program Annual Report Data, data on student enrollment, retention and graduation will be reported and reviewed every five years by the program Coordinator and the Office of Institutional Research and Planning.

The program will seek to mirror the College's minority population (approximately 15%), in enrolled students.	Recruitment efforts will be made each spring and summer for fall enrollment to the program among under-represented and minority groups.	Data will be provided from the Office of Institutional Research and Planning regarding minority, and special population enrollment in the program to assess the degree of success of recruitment efforts each year.
BCC evaluates the Paralegal Program through multi-faceted process that includes two primary factors.	The degree value for specific jobs within particular industries (i.e. healthcare, business, etc.) that provides at or above national wages and the long term job growth projections for jobs within particular industries.	BCC requires curriculum and educational experience in its degree program selection process and seeks to ensure that student learning can be adequately assessed and measured within its current academic structure (i.e. industry based advisory council and faculty input to maintain program relevancy).
Monitor Student Learning	BCC will utilize two cycles of assessment per year.	Measure and assess student performance in discussion board, activities, mastery, exercises, critical thinking assignments, and portfolio projects.
Academic Action Plan	BCC will utilize an Academic Action Plan that aligns Paralegal Program Goals with the Strategic Plan. Paralegal program action plan consists of four goals: 1) student learning, 2) faculty quality, 3) program relevance, and 4) operational efficiency.	Each year, Program Coordinator, Dean of Behavioral & Social Sciences, Associate Vice President of Academic Affairs, Vice President of Academic Affairs, and Director of Institutional Research will analyze data collected twice-yearly (assessment cycle) to review results of planned outcomes to desired outcomes, and to determine any changes that need to be made in curriculum, learning activities, or planned outcomes.

## **EXTERNAL REVIEW AND INSTITUTIONAL RESPONSE**

An external review was undertaken by Katherine A. Currier, J.D., Coordinator of Paralegal and Legal Studies, Elms College; and Deborah B. Walsh, J.D., Assistant Dean of Business, Entrepreneurship and Legal Studies, Middlesex Community College. The reviewers noted that BCC's proposal demonstrated the breadth and depth of a well thought out degree program and found it to be coherent and comprehensive and structured in such a way that the College will be in a good position to begin the ABA approval process. They stated that graduates will be competitive in the paralegal job market. The team suggested that the College reevaluate the program's course

distributions to allow for one or more unrestricted student electives to be in better alignment with ABA accreditation requirements; that the program consider either revising the curriculum to include more transfer appropriate course work or develop a second transfer track degree option; and that BCC should consider including provisions for faculty development and attendance at ABA events and conventions within the planned budget.

BCC will implement the suggested recommendations of the team as the College moves forward with program development. Specifically, the Division Dean, Program Coordinator, and Dean for the Learning Resources Center will further review the requirements of ABA accreditation in terms of cost, especially in the areas of faculty professional development. The Program Coordinator, Faculty, and Dean will review the program requirements to allow students more flexibility in general education electives. The Program Coordinator is developing both a career and transfer option within the Associate Degree program. Conversations have begun with Roger Williams University and UMass Law School for transfer/articulation agreements.

#### STAFF ANALYSIS AND RECOMMENDATION

Board staff thoroughly reviewed all documentation submitted by Bristol Community College and external reviewers. Staff recommendation is for approval of the Associate in Science in Paralegal Studies.

Upon graduating the first class for this program, the College shall submit to the Board a status report addressing its success in reaching program goals as stated in the application and in the areas of enrollment, curriculum, faculty resources and program effectiveness.

## APPENDIX A: CURRICULUM OUTLINE

	Required (Core) Courses in the Major (Total # courses required = 0)	l o
Course Number	Course Title	Credit Hours
LAW 180	Introduction to Law	3
LAW 160	Law Office Technology	3
PLS 101	Civil Litigation and Procedure	3
PLS 120	Basic Legal Research and Writing	3
PLS 121	Family Law and Procedure	3
PLS 230	Criminal Law and Procedure	3
PLS 231	Interviewing and Investigation	3
PLS 232	Advanced Legal Research and Writing	3
PLS 240	Real Estate Law	3
PLS 241	Wills, Estates and Trusts	3
	Sub Total Required Credits	30
	Elective Courses (Total # courses required = 2) (attach list of choices if needed)	•
PLS 233	Juvenile Law	3
PLS 234	Legal Ethics	3
PLS 235	Immigration Law	3
PLS 243	Paralegal Internship	3
	Sub Total Elective Credits	6
	eral Education Requirements Education Offerings (Course Numbers, Titles, and Credits)	# of Gen Ed Credits
	including Literature and Foreign Languages	9
	on I – College Writing 3 credits on II – Writing about Literature 3 credits	
	ntals of Public Speaking 3 credits	0.7
	Natural and Physical Sciences Math OR MTH <b>119</b> – Statistics 3 credits	6-7
Science Elective (3 or		
Social Sciences		
GVT 111 – Introduction to Government 3 credits		
HST 114 – US History	of Social Problems 3 credits	
500 212 - 3001010gy	Sub Total General Education Credits	24-25
	Curriculum Summary	1
	Total credit hours required for degree 60-61	
ENG 101 – Passing S ENG 102 – C or bette	ntration or Other Requirements: Score on Placement Test or C or better in ENG 090 er in ENG 101 Score on Arithmetic Placement Test or Completion of MTH 011	
MTH 119 - Passing S	Score on Algebra Placement Test or Completion of MTH 011 De required based on Reading Placement Test Score.	

**APPENDIX B: PROGRAM BUDGET** 

One Time/ Start Up Costs		Annual Expenses			
000.0	Cost Categories	Year 1	Year 2	Year 3	Year 4
	Full Time Faculty (0.5 D. Yohe annual salary 5 classes)	35, 500	36, 210	36, 934	38, 042
	Part Time/Adjunct Faculty Step 3 rate – 5 classes	14, 610	14, 902	15, 200	15, 656
	Staff (Program Coordinator 0.2 D Yohe annual salary)	14, 200	14, 484	14, 774	15, 217
	General Administrative Costs (paper, supplies printing, travel)	500	500	500	500
	Instructional Materials, Library Acquisitions	15, 000	15,000	15,000	15,000
	Facilities/Space/Equipment	0	0	0	0
	Field & Clinical Resources	0	0	0	0
	Marketing	600	600	600	600
*start up cost	Other (ABA Application fee and annual fee)	0	2,000*	900	900
	TOTALS	80, 410	93, 596	83, 908	85, 915
Gain/Loss per year		-31, 974	5, 779	63, 058	104, 217

Note: Expenses are based on 10 classes per year. Labor costs for years 2 and 3 have a 2% increase and year 4 has a 3% increase. D. Yohe (Program Coordinator) has a total of 70% of her annual salary allocated to the Paralegal Program – spread between FT faculty and Program Coordinator. Her remaining time is devoted to her service as the college's grievance officer.

One Time/Start-Up Support		Annual Income			
	Revenue Sources	Year 1	Year 2	Year 3	Year 4
	Grants	0	0	0	0
	Tuition (24.00 per credit)	7,488	13, 680	22,752	29, 376
	Fees (122.00 per credit)	38, 064	69, 540	115, 656	149, 328
	Instructional Support Fee (9.00 per credit for 0.5 credits generated)	1, 404	2, 565	4, 266	5, 508
	Student Support Fee (37.00 per student per semester)	1, 480	2, 590	4, 292	5, 920
	Departmental	0	0	0	0
	Reallocated Funds	0	0	0	0
	Other (specify)	0	0	0	0
	TOTALS	48, 436	88, 375	146, 966	190, 132