



AMERICAN  
IMMIGRATION  
LAWYERS  
ASSOCIATION

June 3, 2015

The Honorable Patrick Joseph Leahy  
Ranking Member  
Committee on the Judiciary  
United States Senate  
Washington, DC 20510

**Re: EB-5 Regional Center Program: Job Creation Methodology**

Dear Senator Leahy:

We write to you on behalf of the American Immigration Lawyers Association (AILA) and AILA's EB-5 Committee, with the understanding that some Members of Congress and others may be seeking information regarding whether the counting of indirect and induced jobs is an acceptable manner of determining job creation caused by new capital investments in the local economy, both generally, and in particular as used in the EB-5 Regional Center Program. AILA is a voluntary bar association of more than 14,000 attorneys and law professors practicing, researching, and teaching in the field of immigration and nationality law. Part of the mission of AILA's EB-5 Committee is to monitor the administration of the EB-5 Program by U.S. Citizenship and Immigration Services (USCIS). The EB-5 Committee also seeks to collaborate proactively with USCIS and elected representatives to ensure that the EB-5 Program operates lawfully, efficiently, and with integrity.

We write this letter to provide background regarding:

1. The legal context for counting indirect job creation in the EB-5 Regional Center Program and USCIS's adjudication practices respecting indirect job creation;
2. The U.S. federal and state governments' regular use of indirect and induced job creation modeling, affirming the acceptance of indirect job creation as a tool for measuring economic impacts of proposed projects; and
3. The negative impact that eliminating or restricting the use of indirect or induced jobs in the EB-5 program would have on small investment projects.

**Legal Context**

Pursuant to USCIS regulations at 8 CFR §§204.6(m)(1), (7), the EB-5 Regional Center Program allows investors to satisfy the job creation requirements of the EB-5 Program based on new jobs created directly in the new commercial enterprise, and new indirect and induced jobs created in

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the local economy. Section 610 of Public Law 102-395 (Oct. 6, 1992) (as amended) and existing USCIS regulations require that direct, indirect, and induced job creation in EB-5 visa petitions sponsored by EB-5 Regional Centers be determined through reasonable methodologies. Pursuant to 8 CFR §§204.6(m)(3)(ii), each EB-5 Regional Center must provide verifiable detail as to how jobs will be created indirectly.

In practice, the only “reasonable methodologies” that USCIS accepts are well-established and verifiable Input-Output economic models. There are three or four dominant models including the Regional Input-Output Modeling System (known as RIMS II) administered by the Bureau of Economic Analysis, and the Impact Analysis for Planning data (known as IMPLAN), an impact modeling system originally developed under the USDA Forest Service. We discuss RIMS II and IMPLAN in Section 2 of this letter.

USCIS imposes important restrictions on crediting investors with direct, indirect, and induced jobs determined by reasonable methodologies. For example, USCIS does not permit investors to count direct construction-phase jobs unless the project has a construction timeline of two or more years. Where construction is claimed to take two or more years, USCIS requires independent evidence to verify the reasonableness of the construction timeline. Similarly, USCIS requires independent evidence to verify the reasonableness of construction budget figures that are used as inputs in reasonable economic methodologies, and disallows the use of a number of common construction budget line items as inputs to the Input-Output models, thereby restricting the number of jobs. Further, USCIS prohibits investors from counting jobs from future tenants of a building constructed with EB-5 capital unless a clear nexus is established between the EB-5 capital and tenant operations, and the petitioner establishes that the new tenants are not merely relocated from another location.

The law recognizes that indirect as well as direct jobs may be counted and allows reasonable methodologies to establish the number of such jobs in the EB-5 Regional Center Program, as Congress contemplated pooled investment would have larger regional impacts than investment based on a single investor or entrepreneur. To more accurately measure these greater impacts, Congress called upon the immigration agency to establish “reasonable methodologies” to count all job creation attributable to the pooled investment in the economy – that is, the sum of direct, indirect, and induced jobs among “other positive economic effects.”

### **History of RIMS II and IMPLAN**

Although we are unaware of any data tracking the different methodologies or models used in the EB-5 Regional Center Program, based on the collective experience of the EB-5 Committee, RIMS II appears to be the most prevalent model. RIMS II was developed by the U.S. Department of Commerce (Bureau of Economic Analysis) in the 1970s. RIMS II has been used ever since as a key tool by federal, state, and local governments when determining job creation

or job losses from events impacting local economies.<sup>1</sup> According to the Bureau of Economic Analysis:

*RIMS II is already widely used in both the public and private sectors for estimating the economic impact of an event, construction project, or other change in a local economy. In the public sector, for example, state and local government officials use BEA's regional modeling system to estimate the regional impacts of military base closings... airport construction and expansion.... development of shopping malls and sports stadiums.*<sup>2</sup>

IMPLAN (Impact analysis for PLANning) is another dominant model used in the EB-5 Regional Center Program to measure indirect and induced jobs. Like RIMS II, IMPLAN also arose from the federal government's need to accurately determine both job creation and job loss from events impacting the local economy. IMPLAN was originally developed in 1976 by the USDA Forest Service to study forestry management for the U.S. federal government. From 1984 to 1988, in partnership with the University of Minnesota, the data, and technical support for the program became available to all users. Eventually, the success of IMPLAN allowed the data and support to be provided by a private company named Minnesota IMPLAN Group, Inc. In 2009, IMPLAN was designated as an acceptable way to track new job growth for the American Recovery and Reinvestment Act (ARRA) program.<sup>3</sup>

RIMS II and IMPLAN are both input-output models that at their core examine the interrelationships between industries. Harvard Professor Wassily Leontief pioneered the fundamental research establishing input-output modeling for measuring economic impacts. Professor Leontief was awarded the Nobel Prize in Economics in 1973 for developing input-output models to study how economic changes in one part of the economy affect other parts of the economy.<sup>4</sup> Professor Leontief's models comprise the backbone for tools used generally and in the EB-5 Regional Center Program for measuring job creation and other economic impacts arising from a single stimulus or project.

The origin and use of RIMS II and IMPLAN methodologies by U.S. federal and state governments establish that (1) a full assessment of economic impacts must take indirect and

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<sup>1</sup> See Bureau of Economic Analysis, "RIMS II: An Essential Tool for Regional Developers and Planners (RIMS II User's Guide)," (Dec. 2013), [www.bea.gov](http://www.bea.gov).

<sup>2</sup> See U.S. Department of Commerce, "BEA Tool Allows Businesses to Estimate the Economic Impact of Disasters," (Apr. 21, 2015), [www.commerce.gov](http://www.commerce.gov).

<sup>3</sup> See History of IMPLAN, [www.implan.com](http://www.implan.com).

<sup>4</sup> See Wassily Leontief, Ed., *Input-Output Economics*, 2nd ed. (New York: Oxford University Press, 1986); Steven Landefeld & Stephanie McCulla, "Wassily Leontief and His Contributions to Economic Accounting," *Survey of Current Business* (Mar. 1999); "Wassily Leontief – Biographical," The Nobel Prize Foundation, [www.nobelprize.org](http://www.nobelprize.org); Michael L. Lahr and Erik Dietzenbacher, Eds., *Wassily Leontief and Input-Output Economics* (Cambridge University Press: 2008).

induced job creation into account; and (2) input-output models have a firm foundation and the federal government has had an active role in developing and using these methods to determine the total job creation impact of capital investments.

### **Negative Consequences from Eliminating or Restricting Indirect and Induced New Jobs**

The widely recognized accuracy of Input-Output economic models such as RIMS II, IMPLAN and similar methodologies enable EB-5 Regional Center investment projects to reliably determine the total job creating impact of capital investment projects on the local economy. Any improvements that can be made in job creation determination using Input-Output models through refinement of the evidence used for economic analyses can only result in more robust results built upon an already solid foundation, thereby offering welcome, though marginal, gains.

Preventing EB-5 investors from counting indirect and induced jobs would, on the other hand, have the effect of extraordinarily limiting the ability of EB-5 investors to access small scale capital investment and other projects. Two types of EB-5 projects would be especially harmed by eliminating or restricting the counting of indirect and induced jobs within the EB-5 Program:

- (1) Small capital investment projects that have modest capital investment budgets and a comparatively high reliance on EB-5 investors to contribute financing. For example, start-up businesses, small family-owned hotels, restaurants, production businesses and small farm projects, would all be severely restricted in their ability to raise EB-5 capital if indirect and induced jobs were limited or excluded from the EB-5 Program.
- (2) Any capital investment project involving new construction that has a construction timeline of less than two years would only be able to raise a fraction of EB-5 capital it is currently able to raise where direct, indirect and induced impacts are all counted.

All of these projects have important capital costs, but consistently face limited access to domestic capital sources – especially from bank financing and for new construction – and they only create sufficient direct jobs to satisfy the job creation requirements of a handful of EB-5 investors. This inevitably leaves a gap in financing that will cripple the development of such smaller projects. Paradoxically, eliminating or limiting the use of indirect and induced jobs in the EB-5 Program would produce marginal improvements in the accuracy of job creation determinations, while severely harming the use of EB-5 capital, particularly in smaller projects, which are precisely the kinds of projects best suited for areas suffering from poverty and long-term high unemployment.

We are pleased to include in **Attachment “A”** detailed examples of over 100 economic impact and job creation studies for projects across the United States that accurately, robustly and successfully incorporate indirect and induced jobs. This large sample of economic job creation

studies were not drawn from the EB-5 Regional Center Program, but rather were conducted for a multitude of economic development and planning purposes by federal, state and local entities. The sample of economic impact and job creation studies was obtained from publicly available sources and cites the website for each source. The large majority of economic impact and job creation studies surveyed were conducted using RIMS II or IMPLAN job creation methodologies, thereby confirming the widespread use of these methodologies by governments and institutions across the nation. In all of the economic job creation studies surveyed in Attachment "A," the economists included indirect and induced jobs in the job creation determinations, which verifies the prevalent and accepted use of indirect and induced job creation determinations in economic impact studies throughout the United States in both EB-5 and non-EB-5 contexts.

### **Conclusion**

We hope that the foregoing assures you and others interested in the EB-5 Regional Center Program that indirect and induced job creation is a valid measure of total job creation impacts of any capital investment project, including EB-5 projects. There is a small handful of accepted methods EB-5 projects use to measure indirect jobs, and among those, RIMS II and IMPLAN predominate. Both are input-output models originally developed under the direction of U.S. federal agencies. USCIS adjudicates the reasonableness of methodologies used to count indirect and induced impacts in a highly conservative manner, excluding categories of inputs and impacts economists generally would include as valid components of a job study.

The EB-5 Committee would be pleased to provide further background material, if that would be helpful. Please contact Bob Sakaniwa, Senior Associate Director of AILA Advocacy at (202) 507-7642, or by e-mail at [bsakaniwa@aila.org](mailto:bsakaniwa@aila.org).

Thank you very much for your consideration of this important issue.

Sincerely,



Leslie Holman  
AILA President



David Morris, Esq.  
Chair, AILA EB-5 Committee

Encl: Attachment "A"

No.	U.S. STATE	STATE RELIED ON	INDUSTRY SECTOR	ECONOMIC	DIRECT JOBS	INDIRECT JOBS	INDUCED JOBS	WEBLINK TO STUDY
		INPUT-OUTPUT		MODEL USED?	COUNTED?	COUNTED?	COUNTED?	
		ECONOMIC			YES/NO	YES/NO	YES/NO	
		METHODOLOGY?						
		YES/NO						
1	Alabama	Yes	Regions Financial Corporation	IMPLAN	Yes	Yes	Yes	<a href="http://www.regions.com/virtualdocuments/Economic_Impact_Study_2012.pdf">http://www.regions.com/virtualdocuments/Economic_Impact_Study_2012.pdf</a>
2	Alaska	Yes	Pebble Mine	RIMS II	Yes	Yes	Yes	<a href="http://corporate.pebblepartnership.com/files/documents/study.pdf">http://corporate.pebblepartnership.com/files/documents/study.pdf</a>
3	Alaska	Yes	Puget Sound Region's Economy	IMPLAN	Yes	Yes	Yes	<a href="http://www.energy.senate.gov/public/index.cfm/files/serve?file_id=771809fb-2de8-4221-a8e8-98feb840d6d8">http://www.energy.senate.gov/public/index.cfm/files/serve?file_id=771809fb-2de8-4221-a8e8-98feb840d6d8</a>
6	Arizona	Yes	Bioscience Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.flinnscholars.org/file/final_az_biosciimpact.pdf">http://www.flinnscholars.org/file/final_az_biosciimpact.pdf</a>
7	Arizona	Yes	Military Operations	IMPLAN	Yes	Yes	Yes	<a href="http://www.dm.af.mil/shared/media/document/afd-110822-041.pdf">http://www.dm.af.mil/shared/media/document/afd-110822-041.pdf</a>
8	Arkansas	Yes	University of Arkansas Medical School	IMPLAN	Yes	Yes	Yes	<a href="http://www.uamshealth.com/upload/docs/Institutional%20Data/Impact-Study.pdf">http://www.uamshealth.com/upload/docs/Institutional%20Data/Impact-Study.pdf</a>
9	Arkansas	Yes	Entergy Corp.	IMPLAN	Yes	Yes	Yes	<a href="http://www.energy-arkansas.com/content/economic_development/docs/EAI_Impact_Study.pdf">http://www.energy-arkansas.com/content/economic_development/docs/EAI_Impact_Study.pdf</a>
10	Arkansas	Yes	Fayetteville Shale	IMPLAN	Yes	Yes	Yes	<a href="http://cber.uark.edu/files/Revisiting_the_Economic_Impact_of_the_Fayetteville_Shale.pdf">http://cber.uark.edu/files/Revisiting_the_Economic_Impact_of_the_Fayetteville_Shale.pdf</a>
11	California	Yes	University of CA, Riverside	IMPLAN	Yes	Yes	Yes	<a href="https://www.ucr.edu/economicimpact/pdf/eip.pdf">https://www.ucr.edu/economicimpact/pdf/eip.pdf</a>
12	California	Yes	West Coast Ports	RIMS II	Yes	Yes	Yes	<a href="http://www.pmanet.org/wp-content/uploads/2014/06/West-Coast-Ports-Economic-Impact-and-Competitiveness.pdf">http://www.pmanet.org/wp-content/uploads/2014/06/West-Coast-Ports-Economic-Impact-and-Competitiveness.pdf</a>
13	California	Yes	Infrastructure Investment	Other	Yes	Yes	Yes	<a href="http://www.bayareaeconomy.org/media/files/pdf/P3-CaliforniaInfrastructureUpdateWhitePaper2012Jan.pdf">http://www.bayareaeconomy.org/media/files/pdf/P3-CaliforniaInfrastructureUpdateWhitePaper2012Jan.pdf</a>
14	Colorado	Yes	Solar Industry	NREL JEDI	Yes	Yes	Yes	<a href="http://solarcommunities.org/wp-content/uploads/2013/10/TSF_COSEIA-Econ-Impact-Report_FINAL-VERSION.pdf">http://solarcommunities.org/wp-content/uploads/2013/10/TSF_COSEIA-Econ-Impact-Report_FINAL-VERSION.pdf</a>
15	Colorado	Yes	Craft Brewers Industry	IMPLAN	Yes	Yes	Yes	<a href="https://www.brewersassociation.org/attachments/0000/9192/Colorado_Brewers_Guild_Economic_Impact_Study_04-21-12.pdf">https://www.brewersassociation.org/attachments/0000/9192/Colorado_Brewers_Guild_Economic_Impact_Study_04-21-12.pdf</a>
16	Colorado	Yes	Colorado's Higher Education	RIMS II	Yes	Yes	Yes	<a href="http://highered.colorado.gov/Publications/Studies/2007/200712_ImpactofHE.pdf">http://highered.colorado.gov/Publications/Studies/2007/200712_ImpactofHE.pdf</a>
17	Connecticut	Yes	Recycling Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.ct.gov/deep/lib/deep/waste_management_and_disposal/solid_waste/transforming_mats_mgmt/gov_recycling_work_group/appendix_1.pdf">http://www.ct.gov/deep/lib/deep/waste_management_and_disposal/solid_waste/transforming_mats_mgmt/gov_recycling_work_group/appendix_1.pdf</a>
18	Delaware	Yes	Agricultural Industry	IMPLAN	Yes	Yes	Yes	<a href="http://ag.udel.edu/deagimpact/AgInDeEconB.pdf">http://ag.udel.edu/deagimpact/AgInDeEconB.pdf</a>
19	Delaware	Yes	Motiva Enterprises DE City Refinery	REMI	Yes	Yes	Yes	<a href="http://archive.delawareonline.com/assets/pdf/BL1275821.PDF">http://archive.delawareonline.com/assets/pdf/BL1275821.PDF</a>
20	Delaware	Yes	Port of Wilmington	RIMS II	Yes	Yes	Yes	<a href="http://www.portofwilmington.com/HTML/our_port/portofwilmington_economicimpactstudy2011.pdf">http://www.portofwilmington.com/HTML/our_port/portofwilmington_economicimpactstudy2011.pdf</a>
21	District of Columbia	Yes	Building Energy Rating & Disclosure Program	IMPLAN	Yes	Yes	Yes	<a href="http://www.peri.umass.edu/fileadmin/pdf/other_publication_types/PERI-IMT-2012-Analysis_Job_Creation.pdf">http://www.peri.umass.edu/fileadmin/pdf/other_publication_types/PERI-IMT-2012-Analysis_Job_Creation.pdf</a>
22	District of Columbia	Yes	Metropolitan Washington Airports	IMPLAN	Yes	Yes	Yes	<a href="http://www.metwashairports.com/file/2012_Economic_Impact_Study.pdf">http://www.metwashairports.com/file/2012_Economic_Impact_Study.pdf</a>
23	District of Columbia	Yes	Potential Economic Impact for Hosting the 2012 Summer Olympics	IMPLAN, WBOC	Yes	Yes	Yes	<a href="https://www.ubalt.edu/jfh/jfh/reports/Olympics2012.PDF">https://www.ubalt.edu/jfh/jfh/reports/Olympics2012.PDF</a>
24	Florida	Yes	Tourism Industry	REMI	Yes	Yes	Yes	<a href="http://floridatourismwatch.org/resources/pdf/2013TourismFINAL.pdf">http://floridatourismwatch.org/resources/pdf/2013TourismFINAL.pdf</a>
25	Florida	Yes	Aerospace Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.cefa.fsu.edu/content/download/110545/1027484/file/Final%20Space%20Florida%20Report%203-14-11.pdf">http://www.cefa.fsu.edu/content/download/110545/1027484/file/Final%20Space%20Florida%20Report%203-14-11.pdf</a>
26	Georgia	Yes	Aerospace Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.georgia.org/wp-content/uploads/2014/03/Aerospace-Economic-Impact-Study.pdf">http://www.georgia.org/wp-content/uploads/2014/03/Aerospace-Economic-Impact-Study.pdf</a>
27	Georgia	Yes	Music Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.georgia.org/wp-content/uploads/2013/09/Georgia-Music-Business-Economic-Impact-Study2011.pdf">http://www.georgia.org/wp-content/uploads/2013/09/Georgia-Music-Business-Economic-Impact-Study2011.pdf</a>
28	Hawaii	Yes	Marine Corps Base	IMPLAN	Yes	Yes	Yes	<a href="http://www.mcbhawaii.marines.mil/Portals/114/WebDocuments/PublicAffairs/Economic%20Impact%20Analysis.pdf">http://www.mcbhawaii.marines.mil/Portals/114/WebDocuments/PublicAffairs/Economic%20Impact%20Analysis.pdf</a>
29	Illinois	Yes	Solar Photovoltaics Industry	JEDI, IMPLAN	Yes	Yes	Yes	<a href="http://renewableenergy.illinoisstate.edu/downloads/publications/FINAL%20Solar%20Economic%20Impact%20Report%20Dec%202013.pdf">http://renewableenergy.illinoisstate.edu/downloads/publications/FINAL%20Solar%20Economic%20Impact%20Report%20Dec%202013.pdf</a>
30	Indiana	Yes	Indiana University	IMPLAN	Yes	Yes	Yes	<a href="http://innovateindiana.iu.edu/docs/economic_impact_study.pdf">http://innovateindiana.iu.edu/docs/economic_impact_study.pdf</a>
31	Indiana	Yes	Wind Power Industry	JEDI, IMPLAN	Yes	Yes	Yes	<a href="http://www.nrel.gov/docs/fy14osti/60914.pdf">http://www.nrel.gov/docs/fy14osti/60914.pdf</a>
32	Indiana	Yes	Tourism Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.visitindianatourism.com/sites/default/files/documents/2012-Economic-Impact-Of-Tourism-In-Indiana.pdf">http://www.visitindianatourism.com/sites/default/files/documents/2012-Economic-Impact-Of-Tourism-In-Indiana.pdf</a>
33	Iowa	Yes	Recycling Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.epa.gov/enawaste/conservation/tools/rmd/rei-rw/pdf/iowa.pdf">http://www.epa.gov/enawaste/conservation/tools/rmd/rei-rw/pdf/iowa.pdf</a>
34	Iowa	Yes	Solar Industry	IMPLAN	Yes	Yes	Yes	<a href="http://votesolar.org/wp-content/uploads/2011/03/Iowa-SolarJobs-Report.pdf">http://votesolar.org/wp-content/uploads/2011/03/Iowa-SolarJobs-Report.pdf</a>
35	Kansas	Yes	Wind Power Industry	JEDI	Yes	Yes	Yes	<a href="http://www.polsinelli.com/~media/Articles%20by%20Attorneys/Anderson_Gibson_Hagedorn_Feb_2014">http://www.polsinelli.com/~media/Articles%20by%20Attorneys/Anderson_Gibson_Hagedorn_Feb_2014</a>
36	Kansas	Yes	National Bio & Agro-Defense Facility	Impact DataSource	Yes	Yes	Yes	<a href="https://www.k-state.edu/nbaf/documents/NBAP%20Economic%20Impact%20Report.pdf">https://www.k-state.edu/nbaf/documents/NBAP%20Economic%20Impact%20Report.pdf</a>
37	Maryland	Yes	American Recovery & Reinvestment Act	StateStat	Yes	Yes	Yes	<a href="http://statestat.maryland.gov/recoveryjobs.asp">http://statestat.maryland.gov/recoveryjobs.asp</a>
38	Maryland	Yes	Defense Base Closure & Realignment	BRAC STAT	Yes	Yes	Yes	<a href="http://business.maryland.gov/Documents/ResearchDocument/BRACJobsSummary2014.pdf">http://business.maryland.gov/Documents/ResearchDocument/BRACJobsSummary2014.pdf</a>
39	Maryland	Yes	Technology Development Corp.	IMPLAN	Yes	Yes	Yes	<a href="http://tedco.md/wp-content/uploads/2014/01/TEDCOeconomicImpactStudy2013ExecutiveSummary.pdf">http://tedco.md/wp-content/uploads/2014/01/TEDCOeconomicImpactStudy2013ExecutiveSummary.pdf</a>
40	Maryland	Yes	Art & Entertainment Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.towson.edu/innovation/resi/downloads/MSAC%20Impact%20Analysis%20Final%20web.pdf">http://www.towson.edu/innovation/resi/downloads/MSAC%20Impact%20Analysis%20Final%20web.pdf</a>
41	Massachusetts	Yes	Port of Boston	RIMS II	Yes	Yes	Yes	<a href="https://www.massport.com/media/261138/massport_final_report_17july2014_updated.pdf">https://www.massport.com/media/261138/massport_final_report_17july2014_updated.pdf</a>
42	Michigan	Yes	Michigan Food Processing Industries	IMPLAN, MEDC	Yes	Yes	Yes	<a href="https://www.michigan.gov/.../foodprocessing1_335931_7.doc">https://www.michigan.gov/.../foodprocessing1_335931_7.doc</a>
43	Michigan	Yes	Transportation Investment Packages	REMI	Yes	Yes	Yes	<a href="http://www.michigan.gov/documents/mdot/MDOT_SLRP_Economic_Impact_Analysis_200445_7.pdf">http://www.michigan.gov/documents/mdot/MDOT_SLRP_Economic_Impact_Analysis_200445_7.pdf</a>
44	Minnesota	Yes	Projects Leveraged by MN Rehabilitation	IMPLAN	Yes	Yes	Yes	<a href="http://www.mnhs.org/shpo/grants/docs_pdfs/Economic_Impact-Historic_Tax_Credit_2011.pdf">http://www.mnhs.org/shpo/grants/docs_pdfs/Economic_Impact-Historic_Tax_Credit_2011.pdf</a>
45	Minnesota	Yes	Residential Building Energy Codes	IMPLAN	Yes	Yes	Yes	<a href="http://www.pnnl.gov/main/publications/external/technical_reports/PNNL-21538.pdf">http://www.pnnl.gov/main/publications/external/technical_reports/PNNL-21538.pdf</a>

No.	U.S. STATE	STATE RELIED ON	INDUSTRY SECTOR	ECONOMIC	DIRECT JOBS	INDIRECT JOBS	INDUCED JOBS	WEBLINK TO STUDY
		INPUT-OUTPUT		MODEL USED?	COUNTED?	COUNTED?	COUNTED?	
		ECONOMIC			YES/NO	YES/NO	YES/NO	
		METHODOLOGY?						
		YES/NO						
46	Minnesota	Yes	Corn & Ethanol Industry	IMPLAN	Yes	Yes	Yes	<a href="https://www.mda.state.mn.us/news/publications/renewable/ethanol/cornethanolecon2008.pdf">https://www.mda.state.mn.us/news/publications/renewable/ethanol/cornethanolecon2008.pdf</a>
47	Mississippi	Yes	Poultry Industry	ERS data	Yes	Yes	Yes	<a href="http://www.thepoultrysite.com/articles/2495/the-mississippi-poultry-industry-and-its-economic-impact/">http://www.thepoultrysite.com/articles/2495/the-mississippi-poultry-industry-and-its-economic-impact/</a>
48	Missouri	Yes	Missouri Statewide Airports	IMPLAN	Yes	Yes	Yes	<a href="http://www.modot.org/othertransportation/aviation/documents/Missouri-2012-Economic-Impact.pdf">http://www.modot.org/othertransportation/aviation/documents/Missouri-2012-Economic-Impact.pdf</a>
49	Montana	Yes	Clean Energy Production Industry	JEDI, IMPLAN	Yes	Yes	Yes	<a href="http://meic.org/wp-content/uploads/2014/06/Synapse-Montana-Jobs-Final-6-5-145.pdf">http://meic.org/wp-content/uploads/2014/06/Synapse-Montana-Jobs-Final-6-5-145.pdf</a>
50	Nebraska	Yes	Ethanol Production Industry	IMPLAN	Yes	Yes	Yes	<a href="http://agecon.unl.edu/documents/2369805/0/Economic+Impacts+of+the+Ethanol+Industry+in+Nebraska+PRINT.pdf/bbec11-bc7c-4f37-a0e1-5b1077a5447d">http://agecon.unl.edu/documents/2369805/0/Economic+Impacts+of+the+Ethanol+Industry+in+Nebraska+PRINT.pdf/bbec11-bc7c-4f37-a0e1-5b1077a5447d</a>
51	Nebraska	Yes	Travel Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.deanrunyan.com/doc_library/NEImp.pdf">http://www.deanrunyan.com/doc_library/NEImp.pdf</a>
52	Nevada	Yes	Mining Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.nevadamining.org/issues_policy/pdfs/NMA-Brief05-Economic%20Impact%20Summary.pdf">http://www.nevadamining.org/issues_policy/pdfs/NMA-Brief05-Economic%20Impact%20Summary.pdf</a>
53	Nevada	Yes	Commercial Casino Industry	AGA Survey	Yes	Yes	Yes	<a href="http://www.americangaming.org/sites/default/files/uploads/docs/final_final_brattle_study_2-3-12.pdf">http://www.americangaming.org/sites/default/files/uploads/docs/final_final_brattle_study_2-3-12.pdf</a>
54	Nevada	Yes	Tourism Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.appliedanalysis.com/projects/lvcvaais/LVCVA-EIS-0313.pdf">http://www.appliedanalysis.com/projects/lvcvaais/LVCVA-EIS-0313.pdf</a>
55	New Hampshire	Yes	Balsams Grand Resort & Wilderness S	IMPLAN	Yes	Yes	Yes	<a href="http://mediad.publicbroadcasting.net/p/nhpr/files/201503/03.02.15_The_Balsams_Economic_Impact.pdf">http://mediad.publicbroadcasting.net/p/nhpr/files/201503/03.02.15_The_Balsams_Economic_Impact.pdf</a>
56	New Hampshire	Yes	Passanger Rail Expansion in NH	TREDIS model	Yes	Yes	Yes	<a href="http://www.edrgrp.com/pdf/NH-PassRail-Economic-Impact-Memo.pdf">http://www.edrgrp.com/pdf/NH-PassRail-Economic-Impact-Memo.pdf</a>
57	New Hampshire	Yes	Construction of High-Voltage Transmi	IMPLAN, RIMS II, RE	Yes	Yes	Yes	<a href="http://s3.documentcloud.org/documents/286344/npt-employment-impacts-final-version.pdf">http://s3.documentcloud.org/documents/286344/npt-employment-impacts-final-version.pdf</a>
58	New Hampshire	Yes	Manufacturing & High-Tech Industries	Other	Yes	Yes	Yes	<a href="http://www.ampednh.com/sites/default/files/smrmtmf.pdf">http://www.ampednh.com/sites/default/files/smrmtmf.pdf</a>
59	New Mexico	Yes	Tourism Industry	REIS	Yes	Yes	Yes	<a href="http://www.santafe.org/images/Embed/2651-Economic%2520Impact%2520of%2520Tourism-Santa%2520Fe%2520County.pdf">http://www.santafe.org/images/Embed/2651-Economic%2520Impact%2520of%2520Tourism-Santa%2520Fe%2520County.pdf</a>
60	New Mexico	Yes	Roca Honda Uranium Mine	IMPLAN	Yes	Yes	Yes	<a href="http://masecoalition.org/wp-content/uploads/2015/05/Roca-Honda-Mine-Economic-Study-Final.pdf">http://masecoalition.org/wp-content/uploads/2015/05/Roca-Honda-Mine-Economic-Study-Final.pdf</a>
61	New York	Yes	Going Green Industry	IMPLAN	Yes	Yes	Yes	<a href="file:///C:/Users/elizabeth/Downloads/2013-gjgny-phase2.pdf">file:///C:/Users/elizabeth/Downloads/2013-gjgny-phase2.pdf</a>
62	New York	Yes	Tourism Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.governor.ny.gov/sites/governor.ny.gov/files/archive/assets/documents/tourism/nys-tourism-impact-2012-v1.0.pdf">http://www.governor.ny.gov/sites/governor.ny.gov/files/archive/assets/documents/tourism/nys-tourism-impact-2012-v1.0.pdf</a>
63	New York	Yes	New York University	IMPLAN	Yes	Yes	Yes	<a href="http://www.nyu.edu/content/dam/nyu/govCommAffairs/documents/NYU_Economic_Impact_Final_Report.pdf">http://www.nyu.edu/content/dam/nyu/govCommAffairs/documents/NYU_Economic_Impact_Final_Report.pdf</a>
64	North Carolina	Yes	Bioscience Industry	IMPLAN	Yes	Yes	Yes	<a href="https://www.ncbiotech.org/sites/default/files/articles/NCBiotech_2012_full_report.pdf">https://www.ncbiotech.org/sites/default/files/articles/NCBiotech_2012_full_report.pdf</a>
65	North Carolina	Yes	Charlotte Region's Engery Industry	EMSI, IMPLAN	Yes	Yes	Yes	<a href="http://charlottechamber.com/clientuploads/Economic_pdfs/Charlotte_Energy_Impact.pdf">http://charlottechamber.com/clientuploads/Economic_pdfs/Charlotte_Energy_Impact.pdf</a>
66	Ohio	No	Wyandot County, OH	IMPLAN	Yes	Yes	Yes	<a href="http://comdev.osu.edu/sites/comdev/files/imce/Economic%20Impact%20Analysis%20Program%20-%20WYandot%20County%20EIA%202014%20Report.pdf">http://comdev.osu.edu/sites/comdev/files/imce/Economic%20Impact%20Analysis%20Program%20-%20WYandot%20County%20EIA%202014%20Report.pdf</a>
67	Oklahoma	Yes	Proposed Regional Mall Development	IMPLAN	Yes	Yes	Yes	<a href="http://www.cityofyukonok.gov/sites/yukon2/uploads/images/YEDA/Three_Rivers_Regional_Mall.pdf">http://www.cityofyukonok.gov/sites/yukon2/uploads/images/YEDA/Three_Rivers_Regional_Mall.pdf</a>
68	Oregon	Yes	Intel's Oregon Operations	IMPLAN	Yes	Yes	Yes	<a href="http://www.intel.com/content/dam/www/public/us/en/documents/reports/intel-oregon-economic-impact-report.pdf">http://www.intel.com/content/dam/www/public/us/en/documents/reports/intel-oregon-economic-impact-report.pdf</a>
69	Oregon	Yes	Travel Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.deanrunyan.com/doc_library/ORImp.pdf">http://www.deanrunyan.com/doc_library/ORImp.pdf</a>
70	Pennsylvania	Yes	Biotechnology Center in Bucks County	RIMS II	Yes	Yes	Yes	<a href="http://pabiotechbc.org/press/pdf/PA_Biotech_Center_Economic_Impact_Study_2013.pdf">http://pabiotechbc.org/press/pdf/PA_Biotech_Center_Economic_Impact_Study_2013.pdf</a>
71	Pennsylvania	Yes	Steel Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.allegheconference.org/PennsylvaniaEconomyLeague/PDFs/EconomicImpactAnalyses/EconomicImpactOfSteelIndustryInPa1011.pdf">http://www.allegheconference.org/PennsylvaniaEconomyLeague/PDFs/EconomicImpactAnalyses/EconomicImpactOfSteelIndustryInPa1011.pdf</a>
72	Pennsylvania	Yes	Homecare & Hospice Industry	IMPLAN	Yes	Yes	Yes	<a href="http://ccedcpa.com/wp-content/uploads/2013-pa-home-care-state-of-the-industry-report.pdf">http://ccedcpa.com/wp-content/uploads/2013-pa-home-care-state-of-the-industry-report.pdf</a>
73	Pennsylvania	Yes	PennEast Pipeline Project	IMPLAN	Yes	Yes	Yes	<a href="http://www.ugicorp.com/files/doc_news/subsidiary/PENNEAST-PIPELINE-PROJECT-ECONOMIC-IMPACT-ANALYSIS.PDF">http://www.ugicorp.com/files/doc_news/subsidiary/PENNEAST-PIPELINE-PROJECT-ECONOMIC-IMPACT-ANALYSIS.PDF</a>
74	Rhode Island	Yes	Proposed South Street Power Station	IMPLAN	Yes	Yes	Yes	<a href="http://www.brown.edu/web/documents/06-2013-AppleseedSSPS.pdf">http://www.brown.edu/web/documents/06-2013-AppleseedSSPS.pdf</a>
75	Rhode Island	Yes	Defense Sector	RIMS II	Yes	Yes	Yes	<a href="http://www.rilin.state.ri.us/Reports/2014%20-%20Defense%20Report%20-%20-%20Final%20-%202007072014.pdf">http://www.rilin.state.ri.us/Reports/2014%20-%20Defense%20Report%20-%20-%20Final%20-%202007072014.pdf</a>
76	South Carolina	Yes	Automotive Industry	NETS, IMPLAN	Yes	Yes	Yes	<a href="http://mooreschool.sc.edu/UserFiles/moore/Documents/rev1_19.pdf">http://mooreschool.sc.edu/UserFiles/moore/Documents/rev1_19.pdf</a>
77	South Carolina	Yes	Manufacturing Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.myscma.com/public_docs/ManufacturingReport_Final.pdf">http://www.myscma.com/public_docs/ManufacturingReport_Final.pdf</a>
78	South Carolina	Yes	BMW Industry	IMPLAN	Yes	Yes	Yes	<a href="http://mooreschool.sc.edu/UserFiles/moore/Documents/Division%20of%20Research/BMWmay.pdf">http://mooreschool.sc.edu/UserFiles/moore/Documents/Division%20of%20Research/BMWmay.pdf</a>
79	South Dakota	Yes	Agriculture Industry	IMPLAN	Yes	Yes	Yes	<a href="https://www.sdstate.edu/econ/commentator/upload/No523.pdf">https://www.sdstate.edu/econ/commentator/upload/No523.pdf</a>
80	South Dakota	Yes	Vineyard & Winery Industries	RIMS II	Yes	Yes	Yes	<a href="http://www.extension.umn.edu/community/economic-impact-analysis/reports/docs/2014-vineyards-wineries-dakotas.pdf">http://www.extension.umn.edu/community/economic-impact-analysis/reports/docs/2014-vineyards-wineries-dakotas.pdf</a>
81	Tennessee	Yes	Foreign Direct Investment in Nashville	IMPLAN, EMSI	Yes	Yes	Yes	<a href="http://www.nashvillechamber.com/docs/default-source/research-center-studies/foreign-direct-investment-in-the-nashville-region.pdf?sfvrsn=2">http://www.nashvillechamber.com/docs/default-source/research-center-studies/foreign-direct-investment-in-the-nashville-region.pdf?sfvrsn=2</a>
82	Tennessee	Yes	Community Health Center Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.tnpcaeducation.org/resourceibrary/datareports/TennesseeEconomicImpactReport2008.pdf">http://www.tnpcaeducation.org/resourceibrary/datareports/TennesseeEconomicImpactReport2008.pdf</a>
83	Tennessee	Yes	Going Green Industry	IMPLAN	Yes	Yes	Yes	<a href="https://www.serdc.org/Resources/Documents/2014%20Documents/MTSU%20Green%20Jobs%20Study%20%281%29.pdf">https://www.serdc.org/Resources/Documents/2014%20Documents/MTSU%20Green%20Jobs%20Study%20%281%29.pdf</a>
84	Texas	Yes	Travel Industry	RTIM models	Yes	Yes	Yes	<a href="http://www.deanrunyan.com/doc_library/TXImp.pdf">http://www.deanrunyan.com/doc_library/TXImp.pdf</a>
85	Texas	Yes	Energy Tower in Midland, TX	IMPLAN	Yes	Yes	Yes	<a href="http://www.recenter.tamu.edu/mdata/pdf/Midland_Midland_EDC_Energy_Tower.pdf">http://www.recenter.tamu.edu/mdata/pdf/Midland_Midland_EDC_Energy_Tower.pdf</a>
86	Texas	Yes	Tourism Industry on Galveston Island	IMPLAN	Yes	Yes	Yes	<a href="http://galvestonparkboard.org/pdf/Economic_Impact_of_Tourism_on_Galveston_Island_Final_05142014.pdf">http://galvestonparkboard.org/pdf/Economic_Impact_of_Tourism_on_Galveston_Island_Final_05142014.pdf</a>
87	Texas	Yes	Wind Energy Industry	JEI, IMPLAN	Yes	Yes	Yes	<a href="http://www.nrel.gov/docs/fy11osti/50400.pdf">http://www.nrel.gov/docs/fy11osti/50400.pdf</a>
88	Utah	Yes	Salt Lake City International Airport	IMPLAN	Yes	Yes	Yes	<a href="http://www.slairport.com/cmsdocuments/Economic_Impact_Analysis_GSBS-Richman_2013.pdf">http://www.slairport.com/cmsdocuments/Economic_Impact_Analysis_GSBS-Richman_2013.pdf</a>
89	Utah	Yes	Life Science's Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.innovationutah.com/assets/Accelerating-Utahs-Life-Science-Industry-UCAP-Strategy-small.pdf">http://www.innovationutah.com/assets/Accelerating-Utahs-Life-Science-Industry-UCAP-Strategy-small.pdf</a>

No.	U.S. STATE	STATE RELIED ON	INDUSTRY SECTOR	ECONOMIC MODEL USED?	DIRECT JOBS COUNTED?	INDIRECT JOBS COUNTED?	INDUCED JOBS COUNTED?	WEBLINK TO STUDY
		INPUT-OUTPUT ECONOMIC METHODOLOGY?			YES/NO	YES/NO	YES/NO	
		YES/NO						
90	Vermont	Yes	Hotel Roanoke & Conference Center	IMPLAN	Yes	Yes	Yes	<a href="https://www.vtnews.vt.edu/articles/2015/04/042315-vtf-hotelimpact-pdf.pdf">https://www.vtnews.vt.edu/articles/2015/04/042315-vtf-hotelimpact-pdf.pdf</a>
91	Virginia	Yes	Aerospace Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.doav.virginia.gov/Downloads/Studies/Workforce/Aerospace%20Impact%202010%20ADA.pdf">http://www.doav.virginia.gov/Downloads/Studies/Workforce/Aerospace%20Impact%202010%20ADA.pdf</a>
92	Virginia	Yes	Virginia Tech Football Program	RIMS II	Yes	Yes	Yes	<a href="https://www.vtnews.vt.edu/articles/2015/04/042315-outreach-football-pdf.pdf">https://www.vtnews.vt.edu/articles/2015/04/042315-outreach-football-pdf.pdf</a>
93	Virginia	Yes	Wine&Grapes Industry	IMPLAN	Yes	No	No	<a href="http://www.virginiawine.org/system/docs/47/original/Virginia_2010_EI_Update_Draft_3.pdf?1328208264">http://www.virginiawine.org/system/docs/47/original/Virginia_2010_EI_Update_Draft_3.pdf?1328208264</a>
94	Virginia	Yes	Fort Lee	IMPLAN	Yes	Yes	Yes	<a href="http://virginialmi.com/content/pdfs/research_2002-07_flee.pdf">http://virginialmi.com/content/pdfs/research_2002-07_flee.pdf</a>
95	Virginia	Yes	Commercial Fishery Industries	RIMS II, IMPLAN, RE	Yes	Yes	Yes	<a href="https://www.wm.edu/as/publicpolicy/documents/prs/jlarc1.pdf">https://www.wm.edu/as/publicpolicy/documents/prs/jlarc1.pdf</a>
96	Virginia	Yes	Port of Virginia	IMPLAN	Yes	Yes	Yes	<a href="http://www.portofvirginia.com/pdfs/POV%20Econ%20Impact%20Study%202014.pdf">http://www.portofvirginia.com/pdfs/POV%20Econ%20Impact%20Study%202014.pdf</a>
97	Washington	Yes	Aerospace Industry	RIMS II	Yes	Yes	Yes	<a href="http://www.psrc.org/assets/10090/CAI_WAP_Impact_Estimates_2013_10-2-13_FINAL.pdf">http://www.psrc.org/assets/10090/CAI_WAP_Impact_Estimates_2013_10-2-13_FINAL.pdf</a>
98	Washington	Yes	University of Washington	IMPLAN	Yes	Yes	Yes	<a href="http://www.wsac.wa.gov/sites/default/files/UWImpactReport.pdf">http://www.wsac.wa.gov/sites/default/files/UWImpactReport.pdf</a>
99	West Virginia	Yes	Forresting Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.wvforestry.com/Economic%20Impact%20Study.pdf">http://www.wvforestry.com/Economic%20Impact%20Study.pdf</a>
100	West Virginia	Yes	North Central WV Technology Industr	IMPLAN	Yes	Yes	Yes	<a href="http://www.affiliateservices.org/WVHTF/media/Wvhtc/Documents/Economic-Impact-of-Technology-FINAL.pdf">http://www.affiliateservices.org/WVHTF/media/Wvhtc/Documents/Economic-Impact-of-Technology-FINAL.pdf</a>
101	West Virginia	Yes	Mountain Valley Pipeline Project	IMPLAN	Yes	Yes	Yes	<a href="http://mountainvalleypipeline.info/wp-content/uploads/2014/12/Mountain_Valley_Pipeline_West_Virginia_Report_10Dec2014.pdf">http://mountainvalleypipeline.info/wp-content/uploads/2014/12/Mountain_Valley_Pipeline_West_Virginia_Report_10Dec2014.pdf</a>
102	Wisconsin	Yes	Tourism Industry	IMPLAN, REIS	Yes	Yes	Yes	<a href="http://www.visitwalworthcounty.com/expenditures/2013%20Wisconsin%20Economic%20Impact.pdf">http://www.visitwalworthcounty.com/expenditures/2013%20Wisconsin%20Economic%20Impact.pdf</a>
103	Wisconsin	Yes	Beef Cattle Industry	IMPLAN	Yes	Yes	Yes	<a href="http://www.beeftips.com/CMDocs/WisconsinBC/2014/SOI%20Wisconsin%202013%205-13-13.compressed.pdf">http://www.beeftips.com/CMDocs/WisconsinBC/2014/SOI%20Wisconsin%202013%205-13-13.compressed.pdf</a>
104	Wisconsin	Yes	Bioscience Industry	IMPLAN, REMI	Yes	Yes	Yes	<a href="http://c.yimcdn.com/sites/www.bioforward.org/resource/resmgr/Industry_Analysis_docs_and_images/BioForward_Economic_Impact_S.pdf">http://c.yimcdn.com/sites/www.bioforward.org/resource/resmgr/Industry_Analysis_docs_and_images/BioForward_Economic_Impact_S.pdf</a>
105	Wyoming	Yes	Coal Industry	REMI, IMPLAN	Yes	Yes	Yes	<a href="http://www.uwyo.edu/cee/_files/docs/wia_coal_full-report.pdf">http://www.uwyo.edu/cee/_files/docs/wia_coal_full-report.pdf</a>
106	Wyoming	Yes	Statewide Airport Industry	IMPLAN	Yes	Yes	Yes	<a href="https://www.dot.state.wy.us/files/live/sites/wydot/files/shared/Aeronautics/ENTIRE%20Wyoming%20Econ%20report-2008-rev9.pdf">https://www.dot.state.wy.us/files/live/sites/wydot/files/shared/Aeronautics/ENTIRE%20Wyoming%20Econ%20report-2008-rev9.pdf</a>
107	Wyoming	Yes	Oil & Gas Development in the West	IMPLAN	Yes	Yes	Yes	<a href="http://www.westernenergyalliance.org/wp-content/uploads/2012/05/Final-Combined-ES-Econ-Impacts-of-OG-Dev-on-Fed-Lands-in-the-West.pdf">http://www.westernenergyalliance.org/wp-content/uploads/2012/05/Final-Combined-ES-Econ-Impacts-of-OG-Dev-on-Fed-Lands-in-the-West.pdf</a>
108	Wyoming	Yes	Marcellus Shale Mining	IMPLAN	Yes	Yes	Yes	<a href="http://www.cbprogress.org/Economic%20Impacts%20in%20Wyoming%20County%202010.pdf">http://www.cbprogress.org/Economic%20Impacts%20in%20Wyoming%20County%202010.pdf</a>