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Information Requests under the Freedom of Access Act

Maine Municipal Association

State and Federal Relations

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By request from the Right to Know Advisory Committee (RTKAC), a survey was conducted on how municipalities have been handling Freedom of Access Act (FOAA) responsibilities during the emergency declaration, what their concerns are, and lessons learned. This report offers an overview of that survey, and provides comparison with previous Maine Municipal Association (MMA) studies.

Executive Summary

Municipalities are committed to complying with information requests under the Freedom of Access Act. This duty bestowed upon municipalities requires time and resources, often consuming more of both than is returned as compensation for services performed.

Fortunately, COVID-19 has not impacted the ability of municipalities to lawfully comply with information requests. Even with the disruption caused by the pandemic, municipal officials estimate 86% of all requests in 2020 were completed within 30 days.

For most municipalities, FOAA requests are not overly onerous. Both the amount and extent of the requests are manageable. The average number of requests received by each municipality has declined since 2018.

Large requests by commercial interests are generally the most burdensome for municipalities. Some officials recommend limiting requests to commercial interests seeking to data mine for third-parties. Vague and expansive requests also make it more difficult and time-consuming to respond.

2020 Survey: Information Requests Under FOAA

Between October 14 and November 2, MMA surveyed municipalities on how they have addressed FOAA requests during the pandemic, how many requests they received, costs accrued versus charged for completing requests, and how much time requests consumed and the timeliness of completing requests. The survey generated 41 responses from all sixteen Maine counties. A complete list of respondents is provided in Appendix A.

Who Completes Requests

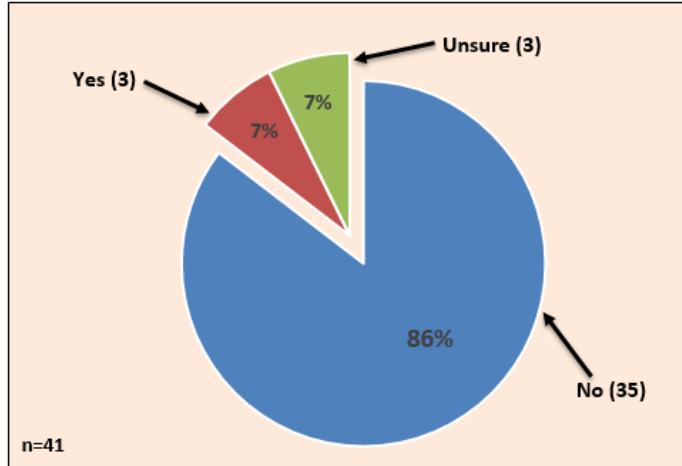
The public access officer (PAO) in every municipality is responsible for complying with information requests under FOAA. Often the PAO holds additional roles and responsibilities. In addition to PAO, the typical person responsible for complying with FOAA requests also fulfills at least two other municipal roles such as town manager or clerk. These municipal officials report spending less than 25% of their time complying with information requests.¹

¹ Question 14: About what percentage of time does the person primarily responsible for complying with information requests spend completing requests? Every respondent answered “less than 25%.”

Changes Due to COVID-19

The sudden changes to public service caused by COVID-19 have not drastically impacted the ability for municipalities to comply with FOAA requests. For 86% (35) of municipalities, responding to FOAA requests has not required more time since the state-of-emergency orders were enacted.

Chart 1: In general, has responding to FOAA requests required more time since the state-of-emergency orders were enacted?



Asked how municipalities changed their approach to complying with FOAA requests, most reported altering very little or nothing. This is because there has either been a decline in FOAA requests during COVID-19, or a burdensome demand for FOAA requests never existed. One municipal official reported, “We have had fewer requests for information during COVID, and haven’t received any in the last two months.” For the Town of Bristol, COVID just continued the existing trend, “We have received no FOAA requests during the COVID emergency. Our last FOAA request was in 2017.”

Of the approaches used during the pandemic, 5% (2) municipalities reported extending disclosure requirements or delaying all requests during the period offices were closed, 41% (17) switched to delivering information requests electronically, while 56% (23) made no changes. The sentiment in Lincolnville is representative of many municipalities, “We have not changed our approach with the exception of trying to be even more accommodating.” Those municipalities that reported the more drastic measures of extending disclosure requirements or delaying all requests, have since returned to normal operations. One such municipality received zero requests during the period it was closed, while another experienced a minor backlog of complex information requests related to a controversial project in the community.

The relative unobtrusiveness of COVID-19 is confirmed by the absence of FOAA request backlogs. Over 90% (37) of municipalities report currently having no backlog of FOAA requests. The most evident impact COVID-19 has on municipal FOAA requests pertains to the amount of requests received.

Total FOAA Requests and Completion Rate

In 2019, municipalities on average, received 7.2 FOAA requests. The presence of COVID-19 has, expectedly, reduced the number of FOAA requests municipalities are receiving. Thus far, municipalities in 2020, on average, have received 4.4 FOAA requests. Proportional reasoning supposes the final average at the end of the year will be approximately 5.3 requests, a 26% decrease from 2019.

Moreover, the requests that municipalities receive are primarily completed within 30 days. Survey results demonstrate that 86% of FOAA requests received by municipalities are completed within 30 days.² Officials in Dixmont state they “are prepared to answer any we do get promptly and

² Municipalities were only included in this statistic if they reported receiving at least one FOAA request in 2020, otherwise the municipality was omitted.

completely.” The explanation for this is most requests are relatively simple and easily completed, “99% of all FOAA requests take less than 30 minutes,” says a Falmouth official. In Minot an official noted, “[Requests] we do receive take less than a few minutes to complete.”

It is the minority of requests that consume the majority of municipal time and resources. These requests are vague, overly broad, litigious or threatening, or hold value for commercial interests.

Certain FOAA requests do have the propensity to bog down municipal officials completing them. Requests that are overly broad or vague are difficult for municipalities to complete due to volume of information included in these requests, and the uncertainty with what information is being requested. In the opinion of one municipal official, there should be limits on what is requested, “text messages and social media posts should not be covered, or have limited access. There should also be limits to the catch-all requests.” This anonymous official shared a frustrating anecdote about broad and vague requests:

For instance, I received a request for “all written communications (letters, memos, emails, text messages, social media posts/messages, etc.) between the Town Manager, or any member of the Planning Board, Select Board or Zoning Board of Appeals, and any other person, regarding the property located at ----- and/or any developments thereof.” This is ridiculous and causes huge amounts of work and expense as we need to have our IT company search emails and then each of those thousands of email need to be reviewed by staff to see what is responsive to the request. – *Maine Town Manager*

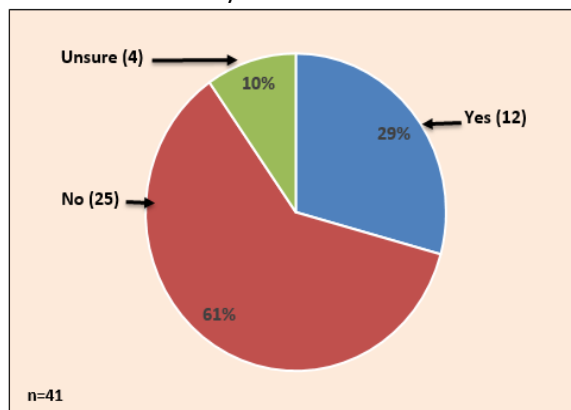
Maine municipalities complete requests as required, but are sometimes laden with large and complex searches. Yet the costs required to complete such searches fall more heavily on the municipality than the individual or organization requesting the information.

Costs and Payments

Municipalities are bearing the financial burden of FOAA requests. Maine permits municipalities to charge \$15 per hour, after the first hour, and fees for copying, postage, and such. The revenue generated by FOAA requests is rarely sufficient to cover costs.

Of 40 municipalities surveyed, 61% do not feel the current compensation structure is sufficient to cover costs for complying with FOAA. A Sabattus official remarked, “\$15 is fine for most. However, for some prolonged requests, the fee isn’t sufficient. A slight increase is warranted, but not by much to ensure the public has reasonable access to this material.”

Chart 2: Is the current compensation structure sufficient to cover your costs?

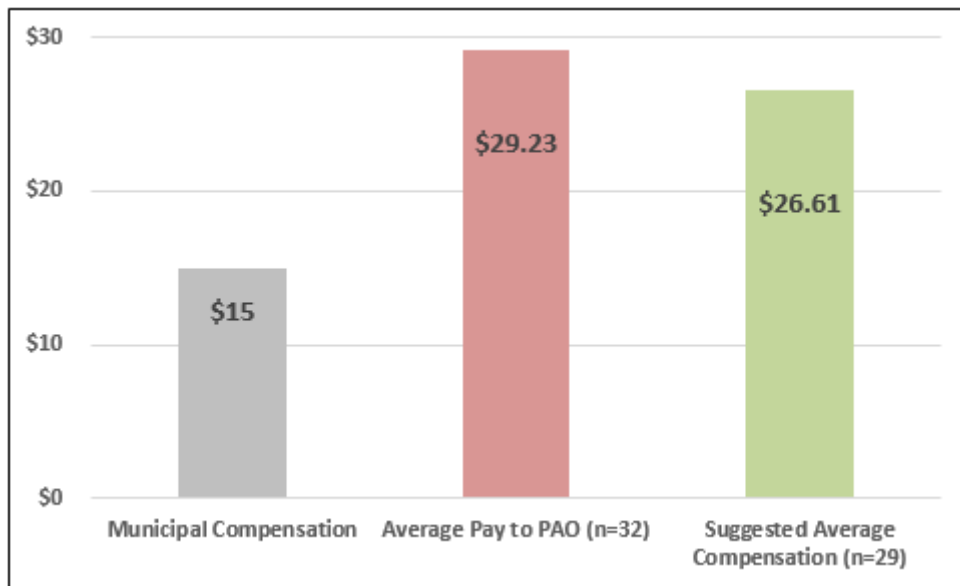


Survey participants were asked the approximate rate paid to the person who primarily responds to FOAA requests. The average rate paid to staff for completing FOAA requests is almost \$30 per hour, roughly twice the amount municipalities charge the public.

Participants were then asked what they feel is an appropriate cost to comply with FOAA requests. The average suggested fee for completing requests was \$26.10, closer to the actual rate paid to individuals conducting information searches.

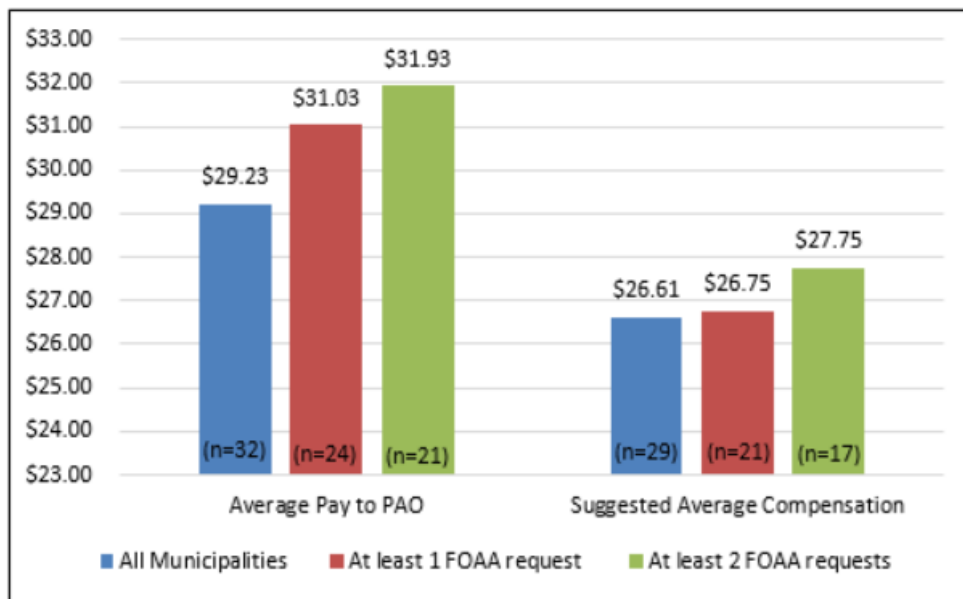
As Chart 3 exhibits, municipalities are suggesting the compensation structure be altered to reflect the heavy cost and time that burdensome FOAA requests consume, but not to a degree that makes requests unreasonably costly for the public. Anecdotes demonstrate that public access officers are interested in preserving easy access to public information. The average compensation for FOAA requests, as suggested by municipalities, is below the reported average pay to PAOs.

Chart 3: Hourly FOAA Costs and Compensation



The gap between what municipalities pay PAOs and suggested compensation for conducting requests grows wider as the number of requests a municipality receives increases. Chart 4 shows the increases in average pay and in suggested compensation as the minimum number of requests is raised from zero, to one, to two. Municipalities that receive more FOAA requests are a better gauge for determining these average costs since they routinely handle requests and their associated costs. Thus the average hourly pay to PAOs and suggested average hourly compensation are likely both higher than shown in Chart 3, closer to \$31.93 and \$27.75 respectively.

Chart 4: Hourly FOAA Costs and Compensation by Group



Municipal officials want to keep the information requesting process accessible and affordable. Many comments reflected the humble desire for compensation of requests to match the cost of searches.

- “Free unless voluminous. Proving the first hour free is good policy. After that it should be actual costs.” - Lincolnville
- “Actual cost of the people that complete requests.” - Anonymous
- “I would suggest that we reduce the free hour to free for the first half hour. I would then charge up to \$25/hr for the next two hours and then the actual rate of pay for the person responding to FOAA requests. In my experience, 99% of all FOAA requests take less than 30 minutes so the general public would still have free access for most requests. It’s the fishing expeditions that take so much time.” – Falmouth
- “\$15 doesn’t even cover the hourly rate of a clerk.... So for nuisance requests this is entirely unfair to the community at large. However, a truly “fair” rate could have a chilling effect upon normal citizens to get legitimate information, so maybe \$20 to cover actual hourly rate of lowest paid and indexed to inflation to keep it current.” - Winthrop

Five comments attached to this question included recommendations for no change to the fee charged, or a decreased fee.

- “I don’t believe a fee should be charged unless the request is extraordinary.” – Belgrade
- “Typically we do not charge as the requests can be fulfilled without too much effort.” – Jay

The data and anecdotes regarding cost and compensation show similarity to the time demands of FOAA requests. In general, the majority of requests are quick, easily completed, and affordable for both the public and the municipality. Oppositely, there are a minority of FOAA request that consume large amounts of time that are infrequently reimbursed fairly. Suggestions to amend the compensation structure include increasing the costs of requests, especially if they cross a volume or time commitment threshold, or limiting the scope of requests.

Summary of 2020 Survey

In summary, the current process of information requests, under the Freedom of Access Act, is generally functioning as intended, even during the COVID-19 emergency.

Every municipality has an identified public access officer, the number of requests is generally manageable for municipal officials, and most requests are still completed within 30 days. The complexity of requests vary; most are simple and quickly completed, some are voluminous and onerous. Yet, officials report that PAOs commit less than 25% of their schedule to completing requests.

The cost and compensation structure of FOAA requests is uneven. Performing information searches cost municipalities about twice the hourly rate they charge members of the public for fulfilling requests. Thus municipalities that receive many or large requests, bear a heavy financial burden of complying with FOAA. Recommendations to adjust the compensation structure include increasing the fee to match actual hourly costs and reducing the first free hour to thirty minutes.

During COVID-19, municipalities have made few changes to their FOAA policies. Most are emphasizing electronic delivery of information and very few have a backlog of requests. This indicates that municipalities are doing what is necessary to comply with FOAA laws.

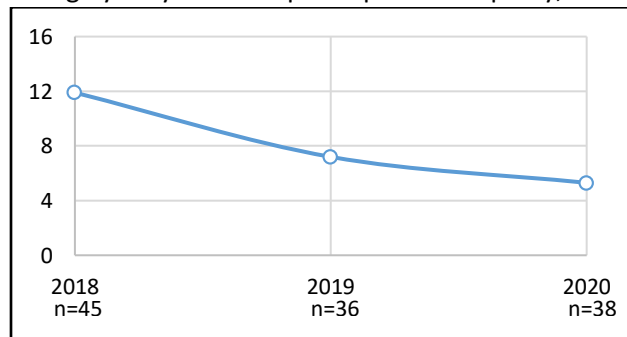
Past Surveys

Freedom of Access Cost and Time Survey (November 2019)

About one year ago, MMA conducted a similar municipal survey on FOAA costs and time commitments. The survey received 50 responses. Unsurprisingly, results from that survey corroborate findings from the 2020 survey. Comparable questions reveal additional trends and insights.

Of 45 responses, the average municipality received 11.9 (n=45) FOAA requests in 2018. This furthers the declining trend of FOAA requests that was observed in the most recent survey. From 2018 to 2019, the average number of FOAA requests dropped nearly 40%. Thus COVID-19 does not account for the entire decline in requests from 2019 to 2020, an established declining trends was already in motion.

Chart 5: Average yearly FOAA requests per municipality, 2018 to 2020³



³ The 2020 average was determined using proportional reasoning. The reported average was 4.4 requests through ten months of the year. Thus a linear projection puts the total yearly average near 5.3 requests.

Prior to COVID-19, the average 30-day completion rate was higher, reported at 99% in 2018 (n=39). The lower completion rate reported in 2020 is likely due to the strain the state-or-emergency placed on municipalities early in the year.

Finally, cost of completing requests was surveyed. Of 44 responses, in 2018 the average rate paid to the person who normally responds to FOAA requests was \$24.96 per hour, compared to \$29.23 in 2020. In both instances, the cost is well-above the fees charged to the public.

Cohort of 12

Of particular interest is how the same municipalities changed over time. Twelve of the municipalities included in the 2020 survey, also participated in 2019. This cohort of twelve municipalities is indicated by bold typeface in Appendix A.

Similar to the general population, this cohort has a declining volume of FOAA requests each year, dropping from 16.1 in 2018, down to a projected 6.4 in 2020. This 60% decline in two years is even more drastic than the decline projected for the entire population. One explanation is this cohort was initially receiving larger volumes of requests, allowing for a more sizable decline over time. Worth noting is that the known drop in FOAA requests in twelve municipalities matches the trend across the Maine.

In 2018, the entire population surveyed averaged wages of about \$25 per hour for persons conducting FOAA requests, while the cohort of twelve averaged just over \$29. By 2020, the wage had ballooned. The entire population surveyed averaged wages just over \$29 per hour for persons conducting FOAA requests, while the cohort of twelve averaged \$31.75. In both surveys the cohort averaged higher rates than the general population. This is likely due to more complex and time-consuming requests as indicated by the larger number of total FOAA requests noted above. The fact that municipalities with generally more FOAA requests are averaging high costs, is indicative of future costs that all municipalities might experience. If FOAA requests, and especially onerous requests, become more pervasive, municipalities will be obliged to ask for an adjusted compensation structure for public information searches.

Municipal Survey Regarding Freedom of Access Act Requests (December 2013)

Although MMA's 2013 does not offer much comparable data, it does reconfirm most of the narrative detailed by the 2020 and 2019 surveys.

Of 93 total respondents, only 22% (20) reported receiving "large-scale FOAA requests within the past three years." This small minority mirrors the more recent sentiments that most FOAA requests are simple and easily completed, and that many municipalities never, or rarely, receive onerous requests.

For the 20 municipalities that recently received large-scale requests, 80% (16) cited volume as the reason these requests are challenging to fulfill, and 60% (12) mentioned vagueness and overbreadth as contributing factors. It appears much has not changed since 2013. The sorts of FOAA requests that were onerous in 2013, are the same requests that bog down municipalities today.

Conclusion

Freedom of Access Act requests are a cornerstone to the open and transparent nature of municipal government. Conducting information requests in compliance with FOAA laws is a duty municipalities have faithfully fulfilled. They intend to continue their tireless efforts in the face of increasingly onerous requests and a growing divide between what municipalities pay for complying with FOAA and what they are permitted to charge the public.

Although the average number of requests per year are dropping, our increasingly litigious culture is likely to impact the complexity and scope of requests municipalities are asked to complete. Complex and voluminous requests are costly to municipalities that pay PAOs almost twice what they charge for conducting searches. Recommendations to even the compensation structure are to: (1) limit the scope of requests to reduce the financial burden municipalities carry; (2) increase compensation to a level reflective of the actual cost of completing requests; and (3) change the length of “free time” municipalities offer at the start of each request.

Beyond reducing the number, the presence of COVID-19 has had limited impact in municipal FOAA requests. Municipalities are still completing requests punctually and report little backlog of requests. Further, the COVID-19 emergency has pushed many municipalities towards offering electronic delivery of information, forward progress that makes the FOAA process more convenient and efficient for municipalities and the public alike.

Appendix A: Respondents by County⁴

<u>Municipality</u>	<u>County</u>	<u>Population</u>	<u>Municipality</u>	<u>County</u>	<u>Population</u>
Minot	Androscoggin	2,642	Bristol	Lincoln	2,709
Poland	Androscoggin	5,426	Bethel	Oxford	2,636
Sabattus	Androscoggin	4,895	Dixfield	Oxford	2,454
Mars Hill	Aroostook	1,410	Greenwood	Oxford	847
Cape Elizabeth	Cumberland	9,038	Rumford	Oxford	5,508
Falmouth	Cumberland	11,358	West Paris	Oxford	1,764
Gray	Cumberland	8,131	Bradley	Penobscot	1,473
Long Island	Cumberland	229	Dixmont	Penobscot	1,164
North Yarmouth	Cumberland	3,716	Lincoln	Penobscot	5,029
Sebago	Cumberland	1,799	Sangerville	Piscataquis	1,276
South Portland	Cumberland	26,288	West Bath	Sagadahoc	1,852
Jay	Franklin	4,735	Madison	Somerset	4,718
Cranberry Isles	Hancock	138	Islesboro	Waldo	548
Deer Isle	Hancock	1,929	Lincolntonville	Waldo	2,229
Lamoine	Hancock	1,606	Waldo	Waldo	822
Belgrade	Kennebec	3,195	Grand Lake Stream	Washington	100
Readfield	Kennebec	2,583	Biddeford	York	22,105
Rome	Kennebec	1,021	Hollis	York	4,512
Winthrop	Kennebec	5,947	Kennebunkport	York	3,408
Rockport	Knox	3,358	Ogunquit	York	848
Union	Knox	2,300			

⁴ Cohort of 12 indicated by bold typeface.

Appendix B: Comments by Question

Q15) In what ways has your municipality changed its approach to complying with FOAA requests during the pandemic? Other: (please specify)

"I do not believe that we have changed our approach with the exception of trying to be even more accommodating. We've put in more time after normal hours to help others get what they need to continue their business."

"Offices have been open internally so no difference. As much electronic as possible."

"We have received no FOAA requests during [the] Covid emergency. Our last FOAA request was in 2017."

"We do not have too many requests so it has not been an issue."

"We have had fewer request for information during Covid and haven't received any in the last 2 months."

"Some delay when staff was initially 100% working remotely"

Q16) If you responded "yes" above, what factors are affecting the time required to complete FOAA requests?

"With access to the public of certain parts of the Town Office limited so the public cannot look up certain information on their own, we have received more requests for information via the telephone or email. Responding to telephone calls and emails takes up more staff time than allowing people to look up information themselves. For public health and safety reasons it is certainly worth it but it has required more time."

"Complicated requests for huge amounts of information. Not necessarily linked to the pandemic in Rockport, but to a controversial project."

"Staff not working in office 100% of time; everything takes more time and effort in COVID-19 environment"

Q23) What do you feel is an appropriate cost to comply with FOAA requests?

"\$15 is fine for most. However some prolonged request the fee isn't sufficient. A slight increase is warranted, but not by much to ensure the public has reasonable access to this material."

“It would depend on the complexity of the search needed.”

“I would suggest that we reduce the free hour to free for the first half hour. I would then charge up to \$25/hr for the next two hours and then the actual rate of pay for the person responding to the FOAA request. In my experience, 99% of all FOAA requests take less than 30 minutes so the general public would still have free access for most request. It’s the fishing expeditions that take so much time.”

“Free unless voluminous. Providing the first hour free is good policy. After that it should be actual costs.”

“Hourly rate of the individual completing the task”

“Actual cost of people that complete requests.”

“Typically we do not charge as the requests can be fulfilled without too much effort.”

“If it takes a few minutes to comply, there should be no charge. If the request takes a lot of time, the rate should match the pay of the individual doing the compilation.”

“I don't believe a fee should be charged unless the request is extraordinary.”

“\$15 doesn't even cover the hourly rate of a clerk, to say nothing indirect costs that would be substantially more than the hourly rate. So for nuisance requests this is entirely unfair to the community at large. However, a truly "fair" rate could have a chilling effect upon normal citizens to get legitimate information, so maybe \$20 to cover actual hourly rate of lowest paid and indexed to inflation to keep it current.”

“If it's minor stuff requiring only pulling a document from a file, and making a copy, we charge \$1/page. For time consuming research the \$15 rate is fine.”

Q24) Please share any additional comments you have regarding you experience in complying with FOAA requests.

“We need to deal with commercial quarterly requests and be able to call those continuations and charge a fee”

“Government at all levels should be easy to access and readily available to the people we serve. We try hard to be just that. Some however utilize FOAA requests as a tool to bog down the process. That said, if a person feels aggrieved by their government they need recourse or a place to turn. We need to work hard so these people don't think that we are the "enemy" when all we really are is an extension of the community.”

"If it cannot be produced electronically, or by simply running a report -- then the timeline & costs should be extended. We simply have too much to do than gather information"

"We warn requesters of the potential total fees. They must agree that they will be paying fees before we do the work. That gets rid of the out of state groups trying to build sales lists for contractors etc."

"As a small community we generally do not receive many FOAA requests"

"There haven't been any requests this year."

"We are fortunate that requests have been quite reasonable."

"We rarely get such requests, but are prepared to answer any we do get promptly and completely."

"We generally do not receive many and most are autogenerated by companies looking to mine information for other service providers. Those that we do receive take less than a few minutes to complete or are so vague but do not respond when we ask for clarification"

"There should be limits - text messages, social media posts should not be covered, or limited access. There should also be limits to the catch-all requests. For instance, I received a request for "all written communications (letters, memos, emails, text messages, social media posts/messages, etc.) between the Town Manager, or any member of the Planning Board, Select Board or Zoning Board of Appeals, and any other person, regarding the property located at 20 Central Street and/or any developments thereof." This is ridiculous and causes huge amounts of work and expense as we need to have our IT company search emails and then each of those thousands of email need to be reviewed by staff to see what is responsive to the request."

"Approximately 90% of FOAA requests in our community is from people involved with litigation/threaten litigation or private companies using the information to profit from"

"In general, FOAA requests are easy to fulfill, it is only when you experience an individual who is threatening and conducts themselves in a [way] that is inappropriate does it become a challenging matter. A large fine should be assessed for anyone who conducts themselves in such a manner."

"Requests are universally overly broad so it's difficult to ascertain what exactly the requester is asking for."

Appendix C: Edited Data Values⁵

What is the approximate rate paid to the person who primarily responds to FOAA requests?⁶

n	Original Response	Edited Value in USD
1	\$39.00/hr plus benefits	39.00
2	\$40.00/hr	40.00
3	\$60.00/hr	60.00
4	It varies greatly depending on the official responsible for maintaining the record. My best guesstimate would be \$25-\$35/hr with benefits included.	30.00
5	\$19.25/hr	19.25
6	\$27.00/hr	27.00
7	\$45.00/hr	45.00
8	\$25.00/hr	25.00
9	\$15.00/hr	15.00
10	\$70,000/yr	33.65
11	\$26.00/hr	26.00
12	\$25.00/hr	25.00
13	\$25-\$20/hr	22.50
14	Salary position - \$25/hr	25.00
15	\$34.00/hr	34.00
16	\$18.00/hr	18.00
17	REGULAR SALARY \$20.12/hr	20.12
18	\$48.75/hr	48.75
19	\$15.00/hr	15.00
20	\$40.00/hr (all titles and responsibilities)	40.00
21	\$23,640.05 /yr	11.37
22	\$20.00/hr	20.00
23	\$30.00/hr	30.00
24	\$25.00/hr	25.00
25	\$32.00/hr	32.00
26	\$25.00/hr	25.00
27	\$131,000/yr	62.98
28	\$18.00/hr	18.00
29	\$18.00/hr	18.00
30	\$20.00/hr	20.00
31	\$30.00/hr	30.00
32	Salary - \$72,000/yr	34.62
Average		29.23

⁵ Bolded text refers the cohort of 12 municipalities who participated in both the 2019 and 2020 surveys

⁶ If salary data was provided, a 2080 hour work year was used to determine the hourly rate. Benefits were not factored into edited values. Five ambiguous entries were omitted.

What do you feel is an appropriate cost to comply with FOAA requests?⁷

n	Original Response	Edited Value in USD
1	\$25.00/hr	25.00
2	\$15.00/hr is fine for most. However some prolonged request the fee isn't sufficient. A slight increase is warranted, but not by much to ensure the public has reasonable access to this material.	15.00
3	I would suggest that we reduce the free hour to free for the first half hour. I would then charge up to \$25.00/hr for the next two hours and then the actual rate of pay for the person responding to the FOAA request. In my experience, 99% of all FOAA requests take less than 30 minutes so the general public would still have free access for most request. Its the fishing expeditions that take so much time.	25.00
4	Free unless voluminous. Providing the first hour free is good policy. After that it should be actual costs.	30.00
5	\$15/hr doesn't even cover the hourly rate of a clerk, to say nothing indirect costs that would be substantially more than the hourly rate. So for nuisance requests this is entirely unfair to the community at large. However, a truly "fair" rate could have a chilling effect upon normal citizens to get legitimate information, so maybe \$20 to cover actual hourly rate of lowest paid, indexed to inflation to keep current.	20.00
6	\$25.00/hr	25.00
7	\$25.00/hr after the first hour	25.00
8	Same as current law.	15.00
9	\$30.00/hr	30.00
10	\$25.00/hr plus direct costs	25.00
11	\$30.00/hr	30.00
12	It should be moved to \$25.00/hr	25.00
13	Typically less than 1 hour (so far). \$15.00/hr	15.00
14	\$25.00/hr	25.00
15	\$40.00/hr	40.00
16	Hourly rate of the individual completing the task	18.00
17	\$20.00/hr	20.00
18	Actual cost of people that complete requests.	48.75
19	\$50.00/hr	50.00
20	If it's minor stuff requiring only pulling a document from a file, and making a copy, we charge \$1/page. For time consuming research the \$15.00/hr rate is fine.	15.00
21	\$20.00/hr	20.00
22	\$25.00/hr	25.00
23	\$25.00/hr	25.00
24	\$25.00/hr	25.00
25	\$35.00/hr	35.00
26	If it takes a few minutes to comply, there should be no charge. If the request takes a lot of time, the rate should match the pay of the individual doing the compilation.	25.00
27	\$50.00/hr	50.00
28	\$20.00/hr	20.00
29	\$25.00/hr	25.00
Average		26.61

⁷ Entries #16, 18, and 26 refer to data from a previous entry of the same respondent. Four ambiguous entries were omitted.