



METROPOLITAN MILWAUKEE  
FAIR HOUSING COUNCIL

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WILLIAM R. TISDALE, PRESIDENT AND CEO

May 9, 2008

Mary Charnitz  
Community Development Office  
City of Madison  
215 Martin Luther King, Jr. Boulevard  
Room 280  
P.O. Box 2985  
Madison, WI 53701-2985

**RE: RFP #7925 (Fair Housing Services)**

Dear Ms. Charnitz:

The Metropolitan Milwaukee Fair Housing Council (MMFHC) is submitting an application for funding in response to RFP #7925 regarding Testing of Potentially Discriminatory Practices within Rental Housing in the City of Madison. MMFHC will provide services outlined in the application through its Madison satellite office, the Fair Housing Center of Greater Madison (FHCGM).

Please note that based on our 30-plus years of experience, we believe a full-service approach must be taken for fair housing services to be utilized in the most efficient manner. Simply put, fair housing enforcement relies on outreach and education and taking a piecemeal approach, as suggested in the RFP, further dilutes the effectiveness of the services.

If you have any questions regarding this application, please do not hesitate to contact me at (414) 278-1240 or Nick Novak at (608) 257-0853.

Sincerely,

William R. Tisdale  
President and CEO

## **I. SUMMARY**

The Metropolitan Milwaukee Fair Housing Council (MMFHC) proposes to provide the City of Madison with fair housing enforcement and education and outreach services as described below. Services will be provided by MMFHC and its staff in its Dane County satellite office, the Fair Housing Center of Greater Madison (FHCGM), at a cost of \$30,000.

## **II. PROPOSED SCOPE OF SERVICES**

MMFHC proposes to subcontract with the City of Madison CDBG Program to provide the following comprehensive fair housing enforcement, outreach and education and technical assistance services from June 1, 2008 to May 31, 2009. The deadline for completion of the project in the Request for Proposal (December 30, 2008) is unrealistically short. Any fair housing project including testing and other comprehensive fair housing services requires at least one year to complete, to allow time for analysis of market conditions prior to testing and to ensure that the seasonality of local housing markets is accounted for.

- A) MMFHC will make its complaint intake, case management and investigative services available to persons who believe that they have experienced illegal discrimination in the rental, sales, mortgage lending or insurance markets. MMFHC staff will advise such persons on the provisions of fair housing law and available sources of remedy. As appropriate, MMFHC staff will conduct investigations utilizing testing and make referrals to attorneys and/or administrative agencies.
- B) MMFHC will conduct a systemic investigation of illegal housing discrimination in the City of Madison rental market, including use of testing as an investigative methodology.
- C) MMFHC will make available, on a case-by-case basis, reasonable technical assistance to the City of Madison and its residents, including housing providers and social service agencies that conduct business in the City of Madison. Technical assistance will include, but not be limited to, clarification on fair housing laws, information on legal and/or administrative interpretation of the laws, information on the nature and extent of housing discrimination, demographic data and compliance issues.
- D) MMFHC staff will conduct a minimum of three fair housing presentations to community based organizations, social service agencies, civic or neighborhood organizations, faith-based organizations, or academic groups. Such organizations will either be located in Madison or serve Madison residents.

- E) MMFHC will provide information and referral services for clients who have non-fair housing inquiries. Such inquiries may include questions on topics such as rent abatement, breaking a lease, repair-related concerns and housing subsidies.

### III. NEED FOR PROPOSED SERVICES

#### Demographic Information and Trends

MMFHC proposes to conduct each of the services noted above in Dane County through its satellite, FHCGM. Dane County became more diverse during the 1990s but experienced largely unchanged patterns of residential segregation.<sup>1</sup> From 1990 to 2000, the total population of Dane County grew by 16%, while the black population grew by over 60%. Between 2000 and 2005, Latino and Hmong populations in the county experienced very rapid growth, with 37% and 91% increases, respectively.<sup>2</sup> Dane County minorities remain disproportionately concentrated in Madison, away from growing job opportunities in suburban areas.<sup>3</sup> Further, minorities remain disproportionately concentrated within Madison in a handful of neighborhoods.<sup>4</sup> Poor black renters are highly segregated into a small number of census tracts. In contrast, poor whites are more dispersed throughout Madison.<sup>5</sup> Minorities with children are also much more likely than whites to experience homelessness; in 2006, 87% of families in Dane County shelters described themselves as non-white.<sup>6</sup> There are multiple causes behind these statistics, but discrimination cannot be discounted. When analyzing segregation, in particular, academic researchers have long argued that illegal housing discrimination is the single largest contributing factor behind such inequitable housing patterns.<sup>7</sup>

Numerous other factors point out a need for fair housing services throughout Madison. For instance, roughly half of all Dane County Spanish- and Hmong-speakers have limited English proficiency. Given the rapid growth of immigrant groups, this indicates a growing urgency for fair housing education. The Dane County Analysis of Impediments to Fair Housing Choice states that fair housing education and outreach are “needed to

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<sup>1</sup> Schneider, Pat. “No gains in housing integration: City census shows stagnation.” The Capital Times, 4/5/01. See also Hall, Andy. “Census: Dane County growth led state in ‘90s.” Wisconsin State Journal, 3/9/01, and Hall, Dee J. “Hispanic Population: For new residents, challenges abound.” Wisconsin State Journal, 3/9/01.

<sup>2</sup> U.S. Census American Community Survey, 2005.

<sup>3</sup> See Schneider, 4/5/01, and “Census confirms good, healthy local growth.” Wisconsin State Journal, 3/10/01.

<sup>4</sup> Mosiman, Dean, “Poor city renters are segregated.” Wisconsin State Journal, 2/22/02; U.S. Census, 2000.

<sup>5</sup> Mosiman, Dean, “Poor city renters are segregated.” Wisconsin State Journal, 2/22/02.

<sup>6</sup> City of Madison Community Development Office, “2006 Annual Report on the Homeless Served in Dane County,” July 2007, p. 9.

<sup>7</sup> See, for instance, Douglas Massey and Nancy Denton, *American Apartheid: Segregation and the Making of the American Underclass*. 1998.

address the language barrier that prevents certain racial and ethnic groups from identifying discrimination in the first place and to prevent it in the future.”<sup>8</sup>

Other sources note the need for ongoing fair housing enforcement and education; for example, the Dane County Analysis of Impediments to Fair Housing Choice notes that there is a rising need for education on the topic of accessibility for people with disabilities, especially because of the “increasing number of elderly persons in Dane County over the next 30 years, many of whom will have physical disabilities.”<sup>9</sup>

In addition to problems in the rental market, Dane County minorities face enduring barriers to the sales market, and when they do enter the market, there is evidence that they do so on unequal terms. As a result, housing consumers in this area have an ongoing need for fair housing education and enforcement services that have the adaptability to focus on home purchase and lending processes. For instance, local African Americans participate in the rental market at disproportionate levels – 81% of Dane County black households rent, compared with just 39% of white households, a disparity much greater than that experienced on the national level.<sup>10</sup> Further, Dane County minorities are in great need of education on the topic of fair lending. In 2005, only 9.6% of white borrowers in Dane County received high-cost loans, compared to 41% of African Americans, 23% of Hispanics, 19% of Native Americans, and 12% of Asians.<sup>11</sup> While Dane County has historically experienced low foreclosure rates, its number of foreclosures more than quadrupled from 2005 to 2006, and grew by 80% between January 2007 and January 2008. These rates are greater than those experienced in Wisconsin as a whole, demonstrating a worrisome trend.<sup>12</sup>

### **Information Yielded from Complaints and Investigations**

FHCGM complaint data indicate that minorities, persons with disabilities and other groups continue to face discrimination based on nearly every protected class listed in the Madison Equal Opportunities Ordinance. In 2007, 34% of housing discrimination complaints taken from Dane County were based on race. Of Dane County race-based complaints, over 70% were filed by African Americans. African Americans also filed a disproportionate percentage (13%) of the complaints filed on other bases, including arrest and conviction record, disability, familial status and other protected classes delineated in local ordinances. Also in 2007, just over 30% of Dane County complaints were based on disability, almost 10% were based on arrest and conviction record, 5% were based on familial status and 5% on national origin. The remaining complaints were based on sex, age, color, political beliefs, physical appearance, religion and Section 8 Program participation.

<sup>8</sup> Dane County, “Analysis of Impediments to Fair Housing Choice,” 2004.

<sup>9</sup> Dane County, “Analysis of Impediments to Fair Housing Choice,” 2004.

<sup>10</sup> U.S. Census, 2000.

<sup>11</sup> HMDA Loan/Application Register, 2005. Data compiled by the Nonprofit Center of Milwaukee, 2007.

<sup>12</sup> Balousek, Marv. “Foreclosure Rate Above U.S. Average,” *Wisconsin State Journal*. 3/27/07; Mike Ivey, “County Foreclosures Soar,” *The Capital Times*, 2/7/08.

In both complaint-based and systemic testing, common differences between testers' experiences include:

- Misrepresentation of housing availability
- Misrepresentation of housing costs (including application fees, rents and security deposit requirements)
- Differences in terms and conditions of housing opportunities
- Steering and segregation of families with children within housing developments (for instance, limiting families with children to first-floor units, even when units are available on upper floors)

Other more general observations on the nature of discrimination in Madison can be gleaned from FHCGM testing activities and from outreach and education activities:

- Differences in treatment between testers are often occurring further and further into the timeline of a housing transaction – that is, not during initial visits or phone calls to housing providers, but after multiple visits and phone calls, or after applications have been submitted. This makes discrimination more subtle and difficult to detect, and increases the length and cost of investigations.
- Housing providers and consumers in Madison have a very poor understanding of the “arrest and conviction record” protected class in the City’s ordinance. At every rental management training or community presentation our staff conducts, this protected class generates many questions and concerns. Other locally protected classes, such as physical appearance, military discharge status, etc., are also poorly known.
- Housing providers who work with large management companies have far greater access to fair housing education than do housing providers whose businesses are smaller in scope.

Concern about individual instances of illegal housing discrimination is shared by other local organizations, 22 of which have pledged in-kind support to MMFHC’s enforcement and education activities under two current Fair Housing Initiative Program contracts with the U.S. Department of Housing and Urban Development (HUD).

#### **IV. ORGANIZATIONAL HISTORY AND QUALIFICATIONS**

FHCGM, which commenced provision of fair housing services in March 1998, is a satellite office of MMFHC. The FHCGM office is located at 600 Williamson Street, Suite L4, in Madison, Wisconsin, 53703. MMFHC is located at 600 East Mason Street, Suite 200, Milwaukee, Wisconsin, 53202.

Prompted by prevailing patterns of racial and economic segregation and widespread discrimination in the housing market, 40 citizens organized MMFHC in October 1977. A non-profit, membership-based organization, MMFHC is comprised of men and women

who share a desire to create open and inclusive communities throughout the State of Wisconsin. The purpose of MMFHC is to promote fair housing by combating illegal housing discrimination and by creating and maintaining racially and economically integrated housing patterns. MMFHC fulfills this mission through many local community partnerships and two satellite offices (MMFHC operates a satellite office in the Fox Valley in addition to FHCGM).

MMFHC has operated a statewide enforcement program with affiliate and satellite offices throughout Wisconsin since 1984. MMFHC was the first private fair housing organization in the United States to develop and implement a formal worksharing relationship with a state enforcement agency. This public-private partnership with the Wisconsin Equal Rights Division began in 1982 and has been replicated in several other states. In addition, MMFHC has received over thirteen Fair Housing Initiatives Program (FHIP) grants from HUD since 1990. MMFHC's FHIP grants have included several multi-year enforcement initiatives and several outreach and education contracts that provided fair housing educational services to housing consumers and providers, testers, attorneys and independent living centers across Wisconsin. As part of managing these and other state and local contracts, MMFHC maintains a consistent, uniform record-keeping system.

MMFHC staff have provided technical assistance and training services to HUD, the U.S. Department of Justice, the Federal Reserve Bank of Chicago, the National Fair Housing Alliance and private fair housing agencies throughout the United States. MMFHC has received two Best Practices Awards from HUD for its enforcement activities throughout Wisconsin. In addition, MMFHC was honored with a Trail Blazer Award by the Milwaukee Awards in Neighborhood Development Innovation program for its activities to address predatory lending practices.

MMFHC clients experience high levels of success when seeking a legal remedy to discrimination they've faced. Of the almost 6,000 complainants MMFHC has assisted, approximately 600 have chosen to file lawsuits. Of those 600, MMFHC clients have prevailed in all but 8 cases.

FHCGM utilizes over 45 volunteers as trained testers, as facilitators for education and outreach events and as members of its local Advisory Committee. FHCGM participates in many collaborative relationships with private and public entities, including, as noted above, agreements with 22 other Dane County non-profit organizations who have committed in-kind resources to MMFHC's two current FHIP grants. Together with the participation of volunteers, FHCGM's collaborative relationships with other organizations create a cost-effective and highly efficient way to extend fair housing services to many populations and increase the capacity of organizations participating in such collaborations to serve their clientele.

MMFHC currently provides the following services:

**Enforcement Program**

- Provides complaint intake, case management and investigative services for persons who wish to file allegations of illegal housing discrimination
- Conducts systemic investigations of illegal housing discrimination
- Operates special projects, including settlement compliance and research projects

**Outreach and Education Program**

- Provides presentations to housing consumers, advocates and the general public
- Publishes Fair Housing Keys, a newsletter

**Community and Economic Development (CED) Program**

- Works with community organizations, developers and local policy makers on the need for fair growth and the promotion of racial and economic integration
- Connects lenders with opportunities for lending and investment in central city communities
- Addresses fair lending and seeks to eradicate predatory lending practices through its Strategies to Overcome Predatory Practices (STOPP) initiative

**Training and Technical Assistance Services**

- Provides fair housing technical assistance and professional support to public agencies, civil rights organizations, social service agencies and housing providers
- Conducts training for housing providers and other members of the housing industry

**Key Staff for Proposed Activities**

The following staff will contribute their time to the provision of the fair housing services described in Section II.

**William R. Tisdale** is the President and CEO of MMFHC. Mr. Tisdale has been employed by MMFHC since 1978 and has been its chief executive since 1981. Mr. Tisdale was founding president of the National Fair Housing Alliance. Mr. Tisdale will be responsible for the overall administration and management of the project described in this proposal, including financial responsibilities. Mr. Tisdale is a member of U.S. Congresswoman Gwen Moore's Advisory Committee on Housing and has served as a fair housing advisor to numerous public and private entities, including the U.S. Department of Housing and Urban Development, the Urban Institute and the U.S. Commission on Civil Rights. Mr. Tisdale is also an occasional contributor to academic journals in the fields of civil rights and urban development, and has collaborated with leading academic researchers such as Prof. Gregory Squires of George Washington University to promote understanding of systemic discrimination in the lending and sales markets. In March of this year, Mr. Tisdale was honored with the National Community Reinvestment Coalition's National Community Reinvestment Award in recognition of his local, regional and national leadership on fair housing.

**Carla Wertheim** is MMFHC's Executive Vice-President and will oversee all enforcement activities proposed herein. Ms. Wertheim has been employed by MMFHC since 1978 and has supervised all MMFHC enforcement activities since 1983. Ms. Wertheim has extensive experience in the areas of rental, sales and insurance testing and has served as a technical advisor to HUD and as a trainer for the National Fair Housing Alliance's Fair Housing School programs. She has supervised the implementation of over 10,000 tests in the State of Wisconsin, trained over 1,400 volunteer testers and personally conducted almost 900 tests. Ms. Wertheim's enforcement experience also includes the supervision of several hundred investigations into more complex systemic forms of housing discrimination. Investigations supervised by Ms. Wertheim have resulted in the filing and subsequent successful resolution of 14 patterns and practices lawsuits in federal court since 1990. These investigations, utilizing the method of testing, uncovered systemic forms of discrimination in the rental and insurance markets against African American and Latino persons and households with children.

**Margaret Bowitz**, Director of Case Management and Training, has been employed by MMFHC for 24 years and worked extensively with victims of housing discrimination, including the intake, counseling and processing of almost 4,200 complaints of illegal discrimination. Under a contract with the City of Madison, she will supervise complaint intake and provide direct assistance to clients, attorneys and administrative agencies. Following the referral of complaints, Ms. Bowitz will be responsible for assisting clients during legal and administrative processes, maintaining ongoing contact with attorneys on pending cases and providing assistance to complainants not represented by counsel. These activities ensure that expedient and comprehensive fair housing services are provided to victims of housing discrimination. Ms. Bowitz has also been responsible for the development and implementation of statewide educational seminars for fair housing attorneys. In addition, she has provided training on fair housing laws to almost 8,500 housing providers and consumers.

**Nick Novak**, Deputy Director of Program Operations, has fourteen years of experience in fair housing enforcement and outreach, and has been employed by MMFHC since 1999. Mr. Novak has long provided technical assistance to local, state and federal government, and is currently a member of the Dane County Fair Housing Ordinance Review Subcommittee. Mr. Novak will provide oversight and review of all testing conducted as a part of the proposed project. Mr. Novak has overseen the coordination of over 2,000 tests and personally conducted over 275 tests. In addition, Mr. Novak has conducted 100 tester training sessions and 96 training seminars for housing professionals.

**Megan Kemmet**, Intake Analyst, has over three years of fair housing complaint intake experience and has conducted intake of over 750 complaints. In the proposed scope of services, she will conduct intake of fair housing complaints and maintain communication with complainants prior to referral of complaints to attorneys and/or administrative agencies.



**Tobi Rutten**, Program Services Administrator, was hired in 2005 and will be responsible for conducting investigations and outreach and education activities under the terms of this contract. She will coordinate and conduct tests, in addition to conducting presentations, community contacts, and other education and outreach activities under this contract. Ms. Rutten is a member of the City of Madison Housing Committee and its Housing Affordability Subcommittee. She is also a member of the Affordable Housing Action Alliance and Communities United, and is a past board member of the Tenant Resource Center. Ms. Rutten has personally conducted over 50 tests and has presented fair housing information to over 650 people.

**Tracy L. Stewart**, Investigations Coordinator, has been employed by MMFHC since 2002, and like Tobi Rutten, she will be responsible for conducting investigations and outreach and education activities under the terms of this contract. She has coordinated over 130 tests and conducted nearly 30 tester training sessions. She also has extensive experience conducting presentations to a variety of community groups. Prior to her employment with MMFHC, Ms. Stewart was employed by the City of Madison Equal Opportunities Commission from 1999 to 2001, where she also investigated housing discrimination. Ms. Stewart is also a volunteer in the YWCA of Greater Madison's Racial Justice Program.

## **V. TESTING METHODOLOGY**

The standardized procedures of the MMFHC Enforcement Program will be utilized in the services performed under this contract. FHCGM uses the same testing methodologies. All testing is conducted by trained testers who conduct their activities according to MMFHC's clearly defined standards and reporting requirements. Testers, in their role of objective fact-finders, typically do not know anything about the test other than the characteristics and instructions assigned to them. Prior to conducting testing, testers are typically not told the following information:

- What protected class is the basis of the test
- Whether the test is initiated in response to a complaint or is part of a pattern and practice investigation
- The specific test design
- Whether other testers were assigned to the test
- The identity of any other testers assigned to the test
- The information or treatment provided to any other homeseeker or tester at the same site
- Test results, until the case is resolved

Test assignments are carefully controlled, and test structures vary according to the facts of the complaint. For example, testing may be structured with "matched pair" tests. In such tests, two or more testers utilize matched socio-economic characteristics, except for the characteristic which is the protected class being tested. For example, for a test in response to a race-based complaint, testers would be the same sex, have the same marital

status and number of children, have similar incomes, occupations and employment and rental histories. In essence, the only difference between the two testers would be race. Some other test structures may require only one tester; others may involve the participation of the complainant. Each test is designed to best investigate the particular facts of a complaint or systemic investigation.

As objective fact-finders, testers understand their role is to observe and document experiences. Testers, therefore, do not make subjective determinations as to whether the treatment they received was fair, equal or lawful. Their function in testing is only to gather information.

Testing will be conducted for one of two reasons: 1) in response to a complaint filed with MMFHC, or 2) as part of a systemic investigation. The purpose of conducting systemic testing is to uncover and eliminate systemic or deeply entrenched forms of discrimination in the housing market. Enforcement actions taken as a result of this form of testing can break down illegal barriers to housing and prevent individuals from experiencing injurious form of housing discrimination. MMFHC reserves the right to file enforcement actions based on systemic investigations and review by its General Counsel, if warranted.

The decision to conduct a test in response to a complaint is made on a case-by-case basis. In making this assessment, some factors taken into consideration may include, but not be limited to:

- Whether the property is still on the market
- If the complainant advised the housing provider that MMFHC or FHCGM had been contacted
- Whether the case is so unique or complex that it may not be possible to replicate the situation through a test
- What stage in the housing transaction an alleged act of discrimination occurred

Testing has been determined to be a legal means to gather evidence of illegal housing practices by both federal and state courts – including the United States Supreme Court.<sup>13</sup> Even legislative attempts to prohibit testing were found to be unconstitutional.<sup>14</sup>

## **VI. FEE SCHEDULE**

MMFHC requests that the City of Madison provide \$30,000 to support the full-service fair housing activities listed in Section II. The actual cost of the proposed activities is, in fact, significantly higher; MMFHC will supplement the \$30,000 from the City of Madison with considerable in-kind resources in order to complete the activities described in foregoing portions of this proposal.

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<sup>13</sup> See Havens Realty Corp. v. Coleman (1982).

<sup>14</sup> See United States v. State of Wisconsin (1975).

It is not possible to estimate the number of hours to be expended on each of the activities listed in Section II, and therefore impossible to predict the cost of each proposed activity. It is not possible to predict the number of complaints to be taken during the term of a contract, and as each complaint is unique, it is not possible to pre-determine the amount of time each complaint will require for full intake, investigation and referral. The same may be said for tests conducted as part of a systemic investigation, technical assistance services and information and referral services provided to callers with non-fair housing inquiries.

Please see the attached rate sheet and budget for additional information.

## **VII. REPORTING**

MMFHC will report to the City of Madison CDBG Program in the following ways:

- MMFHC will meet with City CDBG staff to negotiate a contract, including development of a project timeline and scope of services.
- MMFHC will submit four quarterly reports and one final report to the City of Madison CDBG Program staff. These reports will describe all activities conducted under the contracted Scope of Services, such as: numbers of complaints taken, date of complaint intake, the protected class basis of the complaint, the area of the market from which the complaint was received (rental, sales, lending or insurance), the income level of the complainant and complainants' race and sex; numbers of systemic tests conducted; numbers of presentations, where presentations were conducted and how many people were in attendance; numbers of instances of technical assistance and examples of the types of technical assistance provided; and numbers of information and referral services for non-fair housing inquiries provided, as well as examples of types of non-fair housing inquiries received. MMFHC will report on whether any complaint referrals were made to administrative agencies and/or attorneys, and whether any complaints reached legal resolution, including monetary, affirmative and injunctive relief achieved.

MMFHC will not and cannot meet to "review the record of individual complaints, their processing, and testing results" during the course of the contract, as requested in the RFP. Disclosing any such information before a complaint is legally resolved compromises the confidentiality of complainants and the integrity of ongoing investigations. MMFHC does not report this information to any third parties, including funding sources. This includes complaints and lawsuits that may be filed by MMFHC as a result of systemic investigations. As noted above, however, MMFHC will report quarterly on the number of complaints taken, date of complaint intake, the protected class basis of the complaint, the area of the market from which the complaint was received (rental, sales, lending or insurance), the income level of the complainant, complainants' race and sex, whether any

complaint referrals were made to administrative agencies and/or attorneys, and whether any complaints reached legal resolution.

**Metropolitan Milwaukee Fair Housing Council  
City of Madison CDBG Enforcement Grant**

**Program Staffing**

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<b>Enforcement Services</b>		
(includes complaint intake, complaint-based testing, and systemic testing)		
Salaries		12,485
<b>Outreach and Education</b>		
Salaries		3,388
<b>Technical Assistance</b>		
Salaries		3,500
<b>Subtotal Salaries</b>		<b>19,373</b>
<b>Fringe Benefits</b>		<b>3,681</b>

**Operating and Overhead Expenses**

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<b>Direct Costs</b>		<u>miles</u>	<u>rate</u>	
Mileage		200	\$0.51	101
Copying/Printing				65
<b>Subtotal Direct Costs</b>				<b>166</b>
<b>Indirect Costs</b>				<b>6,781</b>
(includes administration, rent, audit, telephone, etc.)				
<b>Total Costs</b>				<b>30,000</b>

Metropolitan Milwaukee Fair Housing Council, Inc.  
 Rate Sheet

revised 01/07/2008

Employee	Job Title	Hourly Rate	Fringe Benefit Hourly Rate	Total Hourly Cost
Bowitz, Margaret	Director of Case Management & Training Services	33.65	6.39	40.05
Kemmet, Megan N.	Intake Analyst	17.31	3.29	20.60
Novak, Nicholas N.	Deputy Director of Program Operations	28.85	5.48	34.33
Rutten, Tobi L.	Program Services Administrator	23.08	4.38	27.46
Stewart, Tracy L.	Investigations Coordinator	20.19	3.84	24.03
Tisdale, William R.	President & CEO	45.67	8.68	54.35
Wertheim, Carla J.	Executive Vice President	43.27	8.22	51.49