June 30, 2000

Mr. James I. Melvin
Director, Division of Policy, Planning and Program Development
Office of Federal Contract Compliance Programs
Room C-3325
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Dear Mr. Melvin:

Proposed Rule Making - 41 CFR §§ 60-1 and 60-2

This letter responds to the request for written comments on the Department of Labor's Office of Federal Contract Compliance Program's (OFCCP) proposed changes to 41 CFR, §§ 60-1 and 60-2.

Background - Maly & Associates

Maly & Associates is a management consulting firm located in San Rafael, California. We specialize in the analysis and reporting of human resource data, affirmative action compliance, and government audits. Our clients are all federal government contractors and range in scope from large, multi-national corporations to smaller organizations of 100+ employees. We assist clients in understanding and complying with the federal regulations for affirmative action, including Executive Order 11246, the Vietnam Era Veterans Readjustment Assistance Act of 1974, and Section 503 of the Rehabilitation Act of 1973. Our firm has written hundreds of Affirmative Action Programs (AAPs) over the almost 14 years that we've been in business, and assisted many clients with compiling their data for EEO-1 Reports, the recent EO Survey, VETS-100 Reports and in preparation for OFCCP audits. We are keenly aware of the high costs and organizational burdens imposed on our clients by unclear regulations and the inconsistent and overlapping government requests for employee data.

Overview - General recommendations for improvements.

The consultants at Maly & Associates see three major overall areas for improving the proposed changes to 41 CFR, §§ 60-1 and 60-2. Those three areas are:

- **Clarity:** Although the OFCCP has made some progress in rewriting the regulations in a more easily-understood manner, many important definitions remain unclear. Precise definitions lend themselves to high quality analytical methods which yield results useful to both contractors and the OFCCP. On the other hand, vague definitions cause confusion, waste time, and lead to differing interpretations which, in turn, lead to disagreements and contentious relationships between the OFCCP

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and contractors. Vague and unclear definitions are a significant reason why audits end up in "the big black hole." Currently, we have four clients whose audits are stalled because our clients and the agency cannot agree on what the regulations actually mean.

- **Confidentiality:** The proposed changes raise important confidentiality issues. Contractors need to feel confident that confidential and proprietary business information is protected.

- **Relevance:** Some of the proposed rules — the EO Survey in particular — require substantial new record keeping and reporting obligations for the contractor, substantial new data collection and analysis burdens for the OFCCP, and all such reports and analyses will be utterly useless because of the significant flaws in OFCCP's methodology for gathering and computing data.

Our critique of the proposed regulations and our specific recommendations follow. In the interest of brevity, we have chosen to comment on only seven sections of what we see are the most problematic of the proposed rules.

§60–1.12 Record Retention.

Record retention has four intertwined problems: (1) the definition of "applicant;" (2) the contractor's responsibility to solicit gender/race/ethnicity information; (3) racial privacy issues; and (4) the disconnect between OFCCP thinking and Internet-era recruiting practices.

(1) The definition for "applicant" shapes the entire record keeping and maintenance process. In the OFCCP's latest (published) definition, "applicant" is defined as "a person who has indicated an interest in being considered for hiring, promotion, or other employment opportunity."[1] This definition is overly broad. In practical terms, even the most casual drop-in or job-seeking website surfer becomes an "applicant," regardless of qualifications or company needs. If this definition becomes binding on employers, this issue alone would lead to a serious new paperwork burden for contractors. Obviously, the larger the number of individuals defined as applicants, the more time, effort and money contractors must allocate to record keeping.

(2) During OFCCP audits in the last year, the agency has taken a tough stand — insisting that soliciting gender/race/ethnicity data is a contractor's responsibility. Most of our clients believe that this new — unpublished — agency position pushes beyond any reasonable interpretation of the regulation's meaning and intent. The rewrite of this section does nothing to clarify the issue. The proposed new section states:

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[1]See "Special Terms You Need to Know to Complete the Survey" from the form *OFCCP Equal Opportunity Survey of Federal Contractor Establishments* dated May 2000.

> "The contractor must be able to identify *where possible,* the gender, race, ethnicity of each applicant." (Emphasis added.)

Many contractors will interpret "where possible" to mean that "it is only possible to identify the gender/race/ethnicity of those applicants who are invited in for an interview." This interpretation, which is already widely used by contractors, directly opposes that which compliance officers are currently touting during audits. The agency does not help its own compliance officers by perpetuating the lack of clarity on whether or not it is a mandatory requirement to solicit gender/ race/ethnicity data. Furthermore, if outright solicitation becomes mandatory under the broad definition of "applicant," contractors face a second explosion of costly record-keeping — none of which the OFCCP has accounted for in its paperwork burden figures provided to the Office of Management and Budget (OMB).

(3) In its quest to gather excessive amounts of data about applicant gender/race/ ethnicity, the OFCCP exhibits insensitivity toward Americans' growing desire for racial privacy. A Zogby poll conducted in April 2000 asked, "Do you feel the government should require you to disclose your race?" More than three out of four respondents (77%) answered "No" (71% of Democrats, 79% of Republicans, 64% of African-Americans, and 81% of Asian-Americans)[2]. Other news reports also claim that citizens want multiracial children to grow up free from rigid racial classifications that force them to identify with one parent's race over the other. If the new regulations require contractors to interrogate job seekers about their gender/race/ethnicity, more individuals will experience an unpopular government policy first-hand.

Perhaps this growing desire for racial privacy is one reason applicants are reluctant to provide these data to potential employers. When one of our clients recently began asking job seekers to return a form reporting their gender/race/ethnicity, only about 3% responded. If 97% of applicants refuse to self-identify voluntarily, it becomes a significant waste of time to force contractors to solicit data in huge numbers when experience proves that applicants are uncooperative in the endeavor.

(4) The disconnect between OFCCP thinking and Internet-era recruiting practices is also problematic.[3] Our clients in the private sector commonly recruit over the Internet. Interestingly, this method turns out to be very advantageous in assuring non-discrimination in the employment process. Since the gender/race/ethnicity of applicants is unknown at this stage of the process, individuals are selected for interviews strictly according to their merits. This is a good thing. Additionally, the typical recruiting practice is to allow individuals to post resumes on company web

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[2] "Race Counts," *Wall Street Journal* (May 30, 2000).

[3] It has been widely reported in human resource publications that Shirley Wilcher, Secretary for Federal Contract Compliance, has publically stated that contractors are already required to seek gender/race/ethnicity information on the masses of Internet job seekers. However, she has never cited a section of the regulations that require this.

sites and fill out employment applications online quickly and easily. As a result, the volume of job seekers reviewed by Human Resource departments has increased substantially. If the OFCCP makes it a mandatory practice for contractors to solicit gender/race/ethnicity data on these thousands upon thousands of inquiries, the contractor's record-keeping burden will grow beyond all reason. The OFCCP should take care to encourage Internet recruiting simply because of its non-discriminating nature. Instead, it appears the agency wants to undercut this recruiting method by insisting upon an unwieldy data collection requirement and unworkable regulations.

Recommendation: In summary, the OFCCP needs to define "applicant" clearly and specifically; it needs to recognize the growing concerns for racial privacy and should not force contractors to solicit applicant gender/race/ethnicity data — and be explicit about this fact; and, it needs to write new regulations that encourage innovative non-discriminating recruiting practices rather than sabotage these efforts.

§60–2.1(d) Who is Included in Affirmative Action Programs.

In the preamble statements for Section 60-2.1, the agency states:

> *...OFCCP decided not to adopt the recommendation that would allow for the development of a 'consolidated' or 'functional' AAP at this time."*

We strongly urge the OFCCP to revisit this position. First, many if not most multi-level, multi-location companies will now be found out-of-compliance because this is exactly the format they have used for years in designing the overall structure of their programs. Here again, the agency appears to be totally out of touch with modern business practices. Most companies have taken great advantage of new communications technology and have organized themselves by function — not by geography. It is quite common today for a company to have multiple entities in a single physical location — without an umbrella management. To force contractors to put employees into AAPs by geography rather than function will undermine the notion of AAP accountability. While it may make sense for government reporting, it makes absolutely no sense for AAP management purposes.

Recommendation: The OFCCP should revisit its decision and allow for the development of a "consolidated" or "functional" AAP.

§60–2.11 Organizational profile.

In its preamble statements to the proposed regulations, the OFCCP claims that the replacement of the workforce analysis with an "organizational profile" benefits contractors by making AAP preparation simpler and less costly. We disagree. Instead, the proposed organizational profile will *multiply* complexities and costs. The required chart is so at odds with normal private sector record keeping that it cannot be produced

without costly and tedious manual work and long, confusing explanations. While the current workforce analysis might be a "paper hog," at least it provides for a listing of the employee population directly from the contractor's existing employee database. Little, if any, manual manipulation of the data is required currently. However, the relevance of the workforce analysis has always been questionable. (We address this issue further when we discuss the requirement that contractors are to evaluate their workforces by "organizational units.")

Recommendation: Drop the proposal for an organizational profile and drop the current workforce analysis because it is not relevant to proper analytical analysis for discrimination based on gender/race/ethnicity.

§60–2.14 Determining availability.

The OFCCP is correct when it states that "The 'eight-factor analysis' for determining availability is one of the most frequently criticized elements of the Executive Order 11246 program." The reduction of the number of factors in the Availability Analysis from eight to two would better align government regulations with common business practice — but problems remain.

The first proposed factor refers to the "reasonable recruitment area," or geographical area from which the contractor "usually seeks or reasonably could seek" employees. The phrase "reasonably could seek" is a prime example of how unclear regulations lead directly to acrimonious relationships between contractors and the OFCCP. If the OFCCP places strictures on how recruiting areas are designated, statistical "false positives" may result. An over-zealous compliance officer could arbitrarily stretch or shrink a contractor's recruiting area to manufacture an artificial statistical indicator of discrimination. Under this scheme, any contractor could be falsely accused, and the proposed wording invites abuse of authority. For this availability factor, contractors must be allowed to calculate availability using their actual recruiting areas under normal business conditions.

The second proposed factor seeks to identify "...the percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization." Virtually every human being is trainable in some sense. Again, an over-zealous compliance officer might interpret this to mean the contractor needs to calculate "trainable" on a much larger but unpractical employee population.

Recommendations: Rewrite Factor 1 to clearly state that contractors may designate reasonable recruiting areas as those which are actual practices under normal business conditions. In Factor 2, the word "trainable" should be dropped.

§60–2.17 Additional required elements of affirmative action programs.

This section is commonly referred to as the AAP's narrative components, as opposed to the statistical/quantitative components. The OFCCP claims that reduction of the required narrative components from ten to four will reduce the burden of developing, maintaining, and updating an AAP by 20%. We consider the agency's estimate to be highly inaccurate. While the number of components would be reduced, the effort in complying with the four new components would increase substantially. For example, the revised wording here portends much more quantitative analyses (for employment data and compensation) than the current regulations require. Worse still, underlying conceptual problems remain. We comment below on two of the four "narrative" components: §§ 60-2.17(a) and 60-2.17(b).

(a) Designation of responsibility. In §2.17 (a), the OFCCP would require that an official be named who is both responsible and *accountable* for implementing a company's equal employment opportunity and AAP. Does this mean that, during compliance reviews, the OFCCP will audit a particular person, such as the Human Resources Vice President, in addition to the company as a whole?

(b) Identification of problem areas. The "in-depth analyses" required by this revised section are both substantial and ambiguous — and to our knowledge, have not been calculated into the burden figures the OFCCP provided to OMB.

- **Evaluate workforce by "organizational unit:"** This requirement already causes considerable confusion and reasonable but conflicting interpretations under existing regulations. The OFCCP's rewrite fails to rectify the problem.

  A false assumption lies beneath the OFCCP's search for discrimination within "organizational units." The agency assumes that if minorities and women are not distributed evenly throughout all a company's "organizational units" — regardless of the unit's size, function, required employee skills, availability of required skills, or applicant flow — discrimination must exist. In fact, diversity in gender/race/ethnicity can differ widely among a company's "organizational units" without discrimination being present. Obviously, data collection and analytical methods based on this flawed assumption are useless to both contractors and the OFCCP.

- **Evaluate "personnel activity:"** Most contractors — and certainly all Maly & Associates' clients — already comply with the requirement to conduct "in-depth analyses" of their employment activity, defined loosely by the OFCCP as "applicant flow, hires, terminations, and promotions." The proposed regulations do not specify a standard analytical method. Will compliance officers accept any reasonable analytical method, or will the current §60–3 apply? Concurrently, many of the criticisms we make below when discussing the definitions and analytical flaws in the proposed EO Survey apply equally to the evaluation of personnel activity required in this section.

Furthermore, if the EO Survey is approved, some contractors may want to point to that report (however flawed it may be) as evidence that they have met the requirements of this section. Would this be acceptable to the OFCCP?

- **Evaluate "compensation system(s):"** This is a totally new rule that adds a substantial burden to the annual AAP update — and, once again, the agency has not calculated it into the burden figures it provided to OMB, nor did the agency provide any preamble comments for this item in its May 4, 2000 *Federal Register* announcement except to say:

  > *More recently, an additional objective of the proposed revision has been to advance the Department of Labor's goal of pay equity...*

  We thought the purpose of the OFCCP was to ensure *non-discrimination* not to *advance* its own agenda. While no one in our firm is an attorney, we understand through the legal seminars we have attended that the responsibility for proving pay discrimination by gender/race/ethnicity belongs to the EEOC under the Equal Pay Act. From the above quote, it appears that the OFCCP would like to take on this responsibility and we question the agency's grab for bureaucratic governance on pay issues especially considering the apparent lack of need. Leading employment discrimination attorneys[4] contend that less than one percent of the claims made — at both the federal and state levels — cite pay discrimination as the reason for the complaint. Therefore, forcing upwards of 100,000 contractor establishments to conduct an extremely complex, burdensome, and statistically invalid analysis[5] makes little sense.

  To remain competitive in the private sector, employers constantly evaluate their pay systems. However, they do so based on factors other than gender, race, and ethnicity. In the private sector, normal business practice is to base compensation on a job's value to the company, market factors including the abundance or shortage of individuals with necessary skills in the recruiting area, plus consideration of a particular individual's education, prior experience, hiring salary demands, performance, and (sometimes, but extremely more rare) length of service. Many years ago, some employers may have used gender/race/ethnicity to determine compensation. Those days are long gone. As stated earlier, today few instances exist in which individuals complain of pay discrimination. To make a rule requiring this unnecessary analysis is overkill on the OFCCP's part and lends itself to the criticism of an over-reaching government agency trying to push its own narrow social agenda.

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[4] Statement made at Silicon Valley Industry Liaison Group meeting on January 27, 2000 by John C. Fox, Fenwick & West, LLP Palo Alto, CA.

[5] While the proposed rule does not advocate a particular compensation analysis method, the agency has been known to use some rather questionable methods. See "OFCCP's Compensation Analysis: A Critique of DuBray's Approach," an article by David A. Copus and Douglas M. Towns in *Employee Relations* (Vol.23, No.2, Autumn 1997).

Recommendations: Leave the responsibility of proving pay discrimination to the EEOC. If this section becomes approved regulation, then the OMB needs to get a recalculation of OFCCP's burden estimates to account for the substantial new quantitative analyses required under "Identification of problem areas."

§60–2.18 Equal Opportunity Survey

The entirely new Equal Opportunity (EO) Survey is, by far, the most problematic item in these proposed new regulations. The EO Survey is riddled with conceptual problems so severe that survey results will be statistically worthless, and the federal government should not force the collection and reporting of any data — especially as cumbersome as this survey — that does not serve a useful purpose.

Significant analytical flaws exist in the OFCCP's methodology for gathering and computing data. These unscientific methods will not reveal the statistical indicators of disparate impact, or anything else related to either compliance or "likely noncompliance." The lack of clarity in the request for information and the OFCCP's use of inappropriate underlying data will lead to serious errors of enforcement and policy.

We recently assisted ten client establishments in their attempts to complete this new form. From that experience, we list below and discuss what we consider to be the most serious flaws with the proposed Survey.

Use of EEO-1 Categories: The EO Survey requires that personnel activity (applicants, hires, promotions, and terminations) and aggregate compensation data be submitted by EEO-1 category. EEO-1 categories are far too general to help the OFCCP understand the personnel and compensation practices of any one particular contractor, because the categories lump together many highly diverse jobs. Furthermore, the agency says it will schedule compliance reviews based on "negative indicators" such as some unidentified degree of disparity in the compensation of men and women or minorities and non-minorities; in, for example, such utterly "unequal work" as a Board certified doctor of medicine and a meeting planner or recruiter of hourly personnel — all of whom are in the EEO-1 category of "Professionals."

The OFCCP claim that contractors will benefit by collecting these data by EEO-1 category is simply not true. Essentially, the EO Survey forces contractors to mix apples and oranges, and thus would actually reduce both OFCCP's and the contractor's ability to assess employment and compensation practices correctly.

Contradictory Reporting Requirements: The EO Survey would require data to be submitted by EEO-1 category. The agency purports it will use these EEO-1 type data to select which contractor AAPs to audit. Yet, contractor AAPs are designed, analyzed and reported by job group! Voila! There is no relationship between the EO Survey and a contractor's AAP. Furthermore, the proposed requirement to file the Survey by EEO-1 category contradicts the requirements of the agency's own new paragraph 8 of the

compliance evaluation scheduling letter. Thus, contractors have to collect and report the same data in a multitude of formats. We do not see where any of this duplicity was accounted for in the agency's justification letter to OMB.

Applicant Issue: As described extensively above, much confusion still surrounds the question of how the EO Survey defines "applicant" and the contractor's regulatory requirement to solicit race and gender data from applicants. Until the issue is settled,[6] accurate cost and burden figures for the EO Survey cannot be estimated and therefore approval to codify it should not be granted.

Burden to Disclose Confidential Employee Pay Data: The EO Survey will force contractors to disclose and give up *onsite* custody of its summarized pay data — argued by many to be some of the most sensitive data in the private sector. Unlike the federal government with its well-known public pay scale, most private employers take great precautions to protect pay data from both competitors and employment agency headhunters. It is true that salary information of the highest paid executives within a public company must already be disclosed in SEC filings and that wage data of employees covered by a collective bargaining agreement are also usually announced publically. However, some companies are simply more challenged by competitors than others — for them "total compensation" for all professionals, for example, may verge on a "trade secret."

In its confidentiality statement on the survey form, OFCCP states the agency, "will treat the information... as sensitive and confidential to the *maximum extent possible* under the Freedom of Information Act (FOIA)." (Emphasis added.) Yet, FOIA is a mandatory disclosure statute over which the OFCCP has no control. Even if we assume that the OFCCP has the highest level of interest in preserving the confidentiality of compensation data, disclosure is required unless the data falls within one of the limited FOIA exemptions — and, OFCCP fails to define which of those exemptions it intends to use.

Historically, the agency has had access to confidential data and has also been permitted to take some of the data offsite — when necessary — in the course of conducting its compliance evaluations. We question the OFCCP's plan to collect data by EEO-1 categories and its goal to compare compensation practices among similarly situated contractors. When it becomes generally known that the OFCCP is collecting these data on upwards of 100,000 contractor establishments, we can assume that there will be an increased level of FOIA activity from journalists, competitors, potential plaintiffs and their counsel, unions, consultants, EEOC, headhunters, stockholders, and any other interested party.

Inappropriate way to view compensation: It is highly improbable that the agency can ever develop a simple, one-size-fits-all method to analyze contractor pay practices, since actual business practice varies so widely. Not one of our clients uses the EEO-1

[6] we understand the "applicant issue" it is still being discussed among the OMB, the OFCCP, and the EEOC.

categories for anything other than reporting their employee population to the federal government on an annual basis. I have never seen nor heard of any company designing a compensation program by EEO-1 categories. It simply is not done. For the OFCCP to ask for and then attempt to analyze compensation data in this way is ludicrous. For example, if the Chairman of the Board is a white male and the manager of the mail room is a black female, the OFCCP will assert that the pay comparison between them provides proof of discrimination since both are reported in the EEO-1 category of "Officials and Managers."

Definition for "Hires": In its request for data on "hires," the EO Survey fails to account for those selection decisions made by an employer which do not result in a "hire." Not accounting for such data appropriately will give the OFCCP an erroneous selection rate in its mathematical computations and will lead inevitably to false conclusions about a contractor's hiring practices. For example, persons who decline an offer, fail the drug screen, or don't show up for the first day of work will be in OFCCP's computation for the "applicant" count (the denominator) but will not be in the computation for the "hire" count (the numerator). The mathematical consequence of this error in computing a selection rate will be to count such applicants as "rejected" by the employer when in fact that hasn't been the case at all. If adopted, the EO Survey needs to change the terminology from "Hires" to "Offers Extended."

Definition of "Promotion": The survey instructions provide a three-prong definition for the term "promotion." To be included in the definition are employees who move into "a position requiring greater skill or responsibility" and employees who "move into a position *with the opportunity* to attain increased pay, rank, skill or responsibility. Most employers' automated record-keeping systems only track promotions when the movement is to a higher job or grade level. Counting the activity associated with the third prong of the definition as promotions will greatly skew any results because there may be "non-competitive" moves counted and a variety of other job change situations which are very subjective to count and classify.

Other Confusing Elements and/or Terminology: In addition to the inappropriate definitions just described, the EO Survey also:

- uses the terms "facility" and "establishment" without describing the differences between the two.

- erroneously assumes that information on the gender of applicants is never "missing or unknown." Contractors should not be forced to guess at either race/ethnicity or gender.

- counts some promotion data twice.

- erroneously assumes that tenure with a company is the only pay variable important enough on which to gather data.

- erroneously assumes that local "establishments" of multi-tiered organizations can identify the company's information on federal government contracts. Most cannot.

OFCCP's Rushed Time Frame: The OFCCP has not yet even developed the analytical model it will use to process EO Survey data, so it is absurd for the agency to impose such a massive data collection effort upon contractors. Competent statisticians understand that studies proceed in three steps: define the problem, select the appropriate analytical model, and then decide how the data should be formatted and collected. The agency has put the cart before the horse. Its backwards approach guarantees an eventual mismatch between the data and the analytical model and will produce a worthless result. It is clear that the agency wants to expand its bureaucratic turf and ramrod this proposal — and this ridiculous Survey — through the rule-making process before a new Administration takes office early next year. In pursuing this agenda, scientific validity is being ignored.

Recommendation - EO Survey: The EO Survey is best understood as yet another in a long series of inconsistent, overlapping, redundant, and confusing reporting obligations imposed on contractors by the OFCCP and other federal agencies. The cost and burden to federal contractors to comply with the EO Survey will be much greater than any benefits the OFCCP is hoping to get from the survey's results.

It is our understanding that at least one employer-sponsored organization[7] recommends that the EO Survey be set aside pending an overall review of all federal record keeping and reporting requirements. On behalf of our 80-plus clients, the consultants at Maly & Associates agree with that recommendation.

§60–2.32 Affirmative action records.

The proposed language in this section appears to imposes some unreasonable demands: "The contractor *must* make available to the OFCCP, *upon request*, records maintained pursuant to §§60-1.12 and 2.10..." (emphasis added). This language, in conjunction with the proposed requirement at §60-2.10(2)(c) ("Contractors *must* maintain and make available to OFCCP documentation of their compliance with §§60-2.11 through 60-2.17") is problematic for our clients because it makes no mention of the concerns contractors continually raise about releasing their confidential company documents offsite (e.g. compensation studies and discrimination analyses). Most of our clients already conduct many of the critical self-analyses now being proposed in these new regulations. However, they do so voluntarily and consider these records highly sensitive, confidential, and proprietary information. We would not recommend that the actual analyses or reports be included within a client's AAP documents because of FOIA concerns (reasons given previously). Yet, after everything is written here, the proposed regulations are silent as to what information must be released *offsite*. This is a serious issue for our clients and any new regulations need to address it in very clear language.

Recommendation: State exactly what information the OFCCP will review at the contractor's work site and what information the contractor *must* release for offsite review

[7] The Equal Employment Advisory Council.

by the agency. Likewise, the agency needs to specify which FOIA exemption it will use to protect confidential and proprietary contractor data.

Paperwork Reduction

Finally, the new proposed regulations, as written, do not allow the OFCCP to meet its obligations to OMB under the Paperwork Reduction Act. The paperwork burden on contractors and the time and cost required to implement these changes cannot be estimated accurately until some of the severe conceptual issues that we have described here are resolved.

We appreciate having this opportunity to share the concerns of our clients and if we can amplify or clarify any of the statements made here, we would be happy to do so. We can be reached during normal business hours at (415) 454-4921.

Sincerely yours,

Anna Mae Maly
Founder/Consultant