










**1. Prior to receiving this survey, were you aware that OFCCP is proposing the rescission of the Interpretive Standards for Systemic Compensation Discrimination and Voluntary Guidelines for Self-Evaluation of Compensation Practices?**

		Response Percent	Response Count
Yes		91.7%	100
No		8.3%	9
Comments:			3
answered question			109
skipped question			5




**2. If yes, what was your initial reaction?**

		Response Percent	Response Count
Positive		20.6%	21
<b>Negative</b>		44.1%	45
Neutral		35.3%	36
Comments:			25
answered question			102
skipped question			12





**3. How would you describe your current use of OFCCP's Voluntary Guidelines for Self-Evaluation of Compensation Practices?**

		<b>Response Percent</b>	<b>Response Count</b>
I am not aware of the Guidelines.		5.6%	6
I am aware of the Guidelines but we do not conduct compensation analyses.		5.6%	6
I am aware of the Guidelines but we do not use them as a guide when conducting compensation analyses.		27.1%	29
<b>I am aware of the Guidelines and we use them as a guide when conducting compensation analyses.</b>		<b>61.7%</b>	<b>66</b>
		Comments:	11
		<b>answered question</b>	<b>107</b>
		<b>skipped question</b>	<b>7</b>





**4. If you use the Voluntary Guidelines for Self-Evaluation of Compensation Practices, which of the following major components do you use? (Check all that apply)**

		<b>Response Percent</b>	<b>Response Count</b>
We develop Similarly Situated Employee Groupings (SSEGs).		64.2%	52
We conduct regression analyses when sample sizes are sufficient.		69.1%	56
<b>We proactively make salary adjustments if there is a significant gender or race/ethnicity difference that we cannot explain.</b>		<b>74.1%</b>	<b>60</b>
		Comments:	11
		<b>answered question</b>	<b>81</b>
		<b>skipped question</b>	<b>33</b>



**5. The Guidelines provide contractors with the option of submitting the results of their analyses (i.e. Compliance Coordination Incentive Option) rather than submitting Item 11 data. What has been your experience with this option?**

		Response Percent	Response Count
We are unfamiliar with the Compliance Coordination Incentive Option.		11.3%	12
<b>We have never tried to use it.</b>		<b>83.0%</b>	<b>88</b>
We have tried to use it but OFCCP wouldn't accept our use of this option.		1.9%	2
We used this option and submitted our results to OFCCP.		3.8%	4
		Comments:	14
		<b>answered question</b>	<b>106</b>
		<b>skipped question</b>	<b>8</b>



**6. How much guidance do you think is necessary from OFCCP for contractors conducting pro-active compensation analyses that examine potential pay discrimination?**

		Response Percent	Response Count
No guidance from OFCCP is needed.		8.3%	9
<b>Some guidance from OFCCP is needed.</b>		<b>58.3%</b>	<b>63</b>
Mandatory guidance from OFCCP is needed.		23.1%	25
Other (please explain below)		10.2%	11
		Comments:	39
		<b>answered question</b>	<b>108</b>
		<b>skipped question</b>	<b>6</b>




**7. In 1978 the federal agencies (EEOC, DOJ, DOL, and CSC) responsible for ensuring equal employment opportunity published the Uniform Guidelines on Employee Selection Procedures. These Guidelines have been used in the vast majority of adverse impact/selection cases. Importantly, these standards provide a common framework for conducting and interpreting adverse impact analyses. Do you believe that a uniform set of cross-agency guidelines for systemic compensation discrimination investigation is necessary?**

		Response Percent	Response Count
Yes		<b>91.4%</b>	<b>96</b>
No		8.6%	9
		Comments:	20
		<b>answered question</b>	<b>105</b>
		<b>skipped question</b>	<b>9</b>









8. OFCCP is proposing that “once rescinded, nothing in the Standards or Voluntary Guidelines or their Preamble can be relied upon as a statement of OFCCP’s interpretation of Title VII Principles or OFCCP regulations.” Therefore, there would be no published guidance on how OFCCP would investigate and enforce systemic compensation discrimination cases. Do you believe that it is necessary for OFCCP to publicly state their interpretation of Title VII Principles in the context of systemic compensation discrimination?

		Response Percent	Response Count
Yes		94.5%	103
No		5.5%	6
Comments:			24
answered question			109
skipped question			5


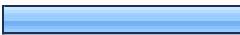



9. In the spring of 2010, the Department of Labor published its regulatory agenda and highlighted two strategies: “Plan/Prevent/Protect” and “Openness and Transparency to Achieve Compliance”. Given OFCCP’s plan to rescind its compensation standards and not publicly replace them (i.e. a publication in the federal register), do you believe that it would be difficult for a contractor to be in position to achieve the DOL’s goal of compliance?

		Response Percent	Response Count
Yes		74.3%	81
No		11.9%	13
Neutral		13.8%	15
Comments:			27
answered question			109
skipped question			5




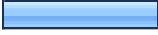
**10. What are the advantages of having a set of compensation guidelines that can be used by OFCCP and the contractor community? (Check all that apply)**

		<b>Response Percent</b>	<b>Response Count</b>
<b>Provides useful guidance on how to conduct a compensation analysis</b>		<b>88.8%</b>	<b>95</b>
Reduces the length or cost of an audit by reducing the number of disagreements over methodological and statistical analysis issues		79.4%	85
Reduces the stress of an audit by reducing the number of disagreements over methodological and statistical analysis issues		73.8%	79
Ensures that OFCCP and the contractor are using a methodology that both OFCCP and the contractor will accept		86.0%	92
Increases the fairness of an audit by standardizing the audit process		83.2%	89
Encourages contractors to proactively correct gender and race/ethnicity disparities in compensation		81.3%	87
Encourages OFCCP and the contractor community to serve as partners in eliminating discrimination		81.3%	87
Other (please explain below)		9.3%	10
		Comments:	16
<b>answered question</b>			<b>107</b>
<b>skipped question</b>			<b>7</b>

**11. What are the disadvantages of having a set of compensation guidelines that can be used by OFCCP and the contractor community? (Check all that apply)**

		<b>Response Percent</b>	<b>Response Count</b>
<b>Limits the ability of the contractor/OFCCP to evaluate compensation practices in a given situation</b>		<b>58.0%</b>	<b>47</b>
Increases the complexity of the process, thus discouraging contractors from conducting a proactive analysis		35.8%	29
Increases the cost associated with conducting a proactive analysis		39.5%	32
Increases the number of disagreements over methodological and statistical analysis issues		35.8%	29
Other (please explain below)		23.5%	19
		Comments:	27
		<b>answered question</b>	<b>81</b>
		<b>skipped question</b>	<b>33</b>



**12. If OFCCP rescinds the Interpretive Standards for Systemic Compensation Discrimination and Voluntary Guidelines for Self-Evaluation of Compensation Practices, and does not publicly replace them with new guidelines, how would you handle future compensation analyses?**

		Response Percent	Response Count
We would no longer conduct a proactive analysis.		7.7%	8
<b>We would continue to follow the Interpretive Standards for Systemic Compensation Discrimination and Voluntary Guidelines.</b>		38.5%	40
We would determine a new way to conduct the analyses that may not be consistent with the Interpretive Standards for Systemic Compensation Discrimination and Voluntary Guidelines.		30.8%	32
Other (please explain below)		23.1%	24
		Comments:	34
		<b>answered question</b>	<b>104</b>
		<b>skipped question</b>	<b>10</b>



**13. Any additional thoughts or comments?**

	Response Count
	15
<b>answered question</b>	<b>15</b>
<b>skipped question</b>	<b>99</b>





**14. Are you a federal contractor and/or sub-contractor?**

		<b>Response Percent</b>	<b>Response Count</b>
Yes		86.6%	97
No		13.4%	15
<b>answered question</b>			<b>112</b>
<b>skipped question</b>			<b>2</b>




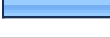
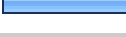
**15. Have you ever been involved in an OFCCP audit?**

		<b>Response Percent</b>	<b>Response Count</b>
Yes		84.8%	95
No		15.2%	17
<b>answered question</b>			<b>112</b>
<b>skipped question</b>			<b>2</b>

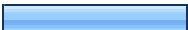





**16. What is your role in your organization?**

		Response Percent	Response Count
<b>Compliance</b>		<b>60.7%</b>	<b>68</b>
Compensation		10.7%	12
Human Resources (general-not related to Compliance or Compensation)		17.9%	20
Legal		10.7%	12
Other (please specify)			12
		<b>answered question</b>	<b>112</b>
		<b>skipped question</b>	<b>2</b>







**17. How many employees are in your organization (U.S. only)?**

		Response Percent	Response Count
Fewer than 100 employees		9.8%	11
100-1,000 employees		9.8%	11
1,001-5,000 employees		13.4%	15
5,001-10,000 employees		9.8%	11
10,001-20,000 employees		16.1%	18
20,001-50,000 employees		19.6%	22
<b>Greater than 50,000 employees</b>		<b>21.4%</b>	<b>24</b>
		<b>answered question</b>	<b>112</b>
		<b>skipped question</b>	<b>2</b>





**18. How many AAPs did your organization create this AAP year?**

		Response Percent	Response Count
Less than 5		27.7%	31
6-10		5.4%	6
11-20		13.4%	15
21-50		16.1%	18
51-100		18.8%	21
Greater than 100		18.8%	21
<b>answered question</b>			<b>112</b>
<b>skipped question</b>			<b>2</b>

**19. How many of your AAPs have 500 or more employees?**

		Response Percent	Response Count
Less than 5		50.0%	56
6-10		7.1%	8
11-20		10.7%	12
21-50		12.5%	14
51-100		13.4%	15
Greater than 100		6.3%	7
<b>answered question</b>			<b>112</b>
<b>skipped question</b>			<b>2</b>

**20. Who conducts your compensation analysis?**

		<b>Response Percent</b>	<b>Response Count</b>
<b>Internally conducted</b>		<b>54.5%</b>	<b>61</b>
External legal counsel		7.1%	8
External consultant/expert		29.5%	33
Other (please specify)		8.9%	10
		<b>answered question</b>	<b>112</b>
		<b>skipped question</b>	<b>2</b>