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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

MAR 1 1985

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The Honorable William E. Dannemeyer
House of Representatives

Dear Mr. Dannemeyer:

Subject: Response to Questions Related to Comparable Worth
and Sex-Based Wage Discrimination (GAO/GGD-85-40)

This report is in response to your January 25, 1985, request that we answer a series of questions on the effectiveness of the comparable worth concept in identifying and remedying sex-based wage discrimination. In answering those questions, we relied extensively on our work in preparing our report entitled Options for Conducting a Pay Equity Study of Federal Pay and Classification Systems (GAO/GGD-85-37), a copy of which is also being furnished.

Question 1: Is there any language in current law affecting federal pay or classification which differentiates on the basis of sex?

Answer: Our review of the laws governing federal civilian employee pay and classification under the General Schedule (5 U.S.C. Chapter 51) and the Federal Wage System (5 U.S.C. Chapter 53, Subchapter IV) indicates there is no statute which differentiates between job classification or pay levels on the basis of sex. We also conducted a computer search of the entire United States Code and found only one statute, applicable to members of the uniformed services, which differentiates on the basis of sex. The provisions of 10 U.S.C. §6015 (1982), pertaining to the assignment of female military personnel, state that:

"The Secretary of the Navy may prescribe the manner in which women officers, women warrant officers, and enlisted women members of the Regular Navy and the Regular Marine Corps shall be trained and qualified for military duty. The Secretary may prescribe the kind of military duty to which such women members may be assigned and the military

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authority which they may exercise. However, women may not be assigned to duty on vessels or in aircraft that are engaged in combat missions nor may they be assigned to other than temporary duty on vessels of the Navy except hospital ships, transports, and vessels of a similar classification not expected to be assigned combat missions."

Question 2: How was the "comparable" pay concept treated in the debate on the Equal Pay Act in 1962 and 1963?

Answer: The legislative history of the Equal Pay Act shows that Congress rejected language requiring equal pay for "comparable" work in favor of the "equal work" standard now contained in the act. The bill which eventually became the Equal Pay Act required equal pay for "work of comparable character on jobs the performance of which requires comparable skills" (HR 11677). It was reported out of the House Committee on Education and Labor and introduced in the full House in 1962. However, the bill was amended later that year to require equal pay for "equal work the performance of which requires equal skills." In final debates over the Equal Pay Act, several Members of Congress noted that, in their view, the intent of the amendment was to narrow the coverage of the act, by including only jobs which are virtually identical.

Question 3: Is consideration given to the gender of employees in federal pay surveys which obtain data on pay in the private sector?

Answer: No consideration is given to the gender of employees in private sector pay surveys made by the federal government. Three such surveys are conducted each year: (1) the National Survey of Professional, Administrative, Technical, and Clerical Pay; (2) the Federal Wage System Appropriated Fund Survey; and (3) the Federal Wage System Nonappropriated Fund Survey. The primary objective of each is to obtain pay rates for comparable occupations in the private sector.

Question 4: Do any of the following factors influence individual earnings: marital status; parental status; age; educational level of parents; undergraduate major; field of employment; quality of undergraduate/graduate schools; job-related training and education; number of years of prior employment experience; number of years of continuous employment (with or without the same employer)? What would be the impact on a job evaluation of failing to control or account for these factors?

Answer: Some of these factors have been shown to influence individual earnings, although the degree of influence can vary by occupation, sector of employment, and other conditions. Studies conducted to examine the effect of some of these factors are discussed in pages 13 through 17 of our report Options for Conducting a Pay Equity Study of Federal Pay and Classification Systems (GAO/GGD-85-37).


All of the factors are characteristics of individuals, not characteristics of jobs that those individuals may hold. Since a basic premise of job evaluation is that the job and not the job occupant is measured, failure to control or account for these factors in a job evaluation study would have no effect on a job's evaluated worth.

Question 5: Is it possible for two job evaluation experts to reach different conclusions about the relative ranking of the same job?

Answer: It is possible for two job evaluation experts to reach different conclusions about the relative ranking of the same job. This is primarily because all job evaluation systems are, to some extent, subjective. Pages 30 and 31 of our report on options for a federal pay equity study discuss several criticisms of job evaluation in measuring the worth of jobs. However, as discussed on pages 31 and 32 of that report, the degree of subjectivity in a job evaluation can be lessened. For example, use of a point-factor evaluation system which quantitatively assigns points to segments of a job is generally considered less subjective than a ranking system which nonquantitatively considers the value of a whole job. The subjectivity of evaluation results may also be reduced (and their reliability increased) by (1) accurate job analysis, (2) careful job description, (3) care in factor selection, description, and weighting, (4) use of job evaluation committees rather than individual evaluators, and (5) involvement of job incumbents and supervisors in the evaluation process.

I hope this responds to your request for information in these areas. We are sending copies of this report to the requestors of our report on options for conducting a federal pay equity study and making copies available to others upon request.

Sincerely yours,



William J. Anderson
Director

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