



FAX COVER SHEET

TO: Stephen Henvellyn, Executive Officer

ORGANIZATION: Equal Employment Opportunity Commission

FROM: Robyn N. Carr

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COMMENTS: RE: Notice of Information Collection - Uniform Guidelines on Employee Selection Procedures (73 Fed. Reg. 15754)

1875 Connecticut Avenue, NW - Suite 650 - Washington, DC 20009 ~ (202) 986-2600 ~ Fax: (202) 986-2539

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May 27, 2008

VIA FACSIMILE

Mr. Stephen Llewellyn
Executive Officer, Executive Secretariat
Equal Employment Opportunity Commission
1801 L Street, NW, 10th Floor
Washington, DC 20507

RE: Agency Information Collection Activities Comments-73 Fed. Reg. 15754—Notice of Information Collection—Uniform Guidelines on Employee Selection Procedures (March 25, 2008)

Dear Mr. Llewellyn:

On behalf of the National Partnership for Women & Families (National Partnership), we submit these comments in response to the Equal Employment Opportunity Commission's (the Commission) proposed information collection related to the Uniform Guidelines on Employee Selection Procedures (Agency Information Collection Activities: Notice of Submission for OMB Review; Request for Comments, 73 Fed. Reg. 15754 (March 25, 2008 15, 2007), hereinafter referenced as the Uniform Guidelines). The National Partnership is a nonprofit, nonpartisan organization that uses public education and advocacy to promote fairness in the workplace, quality health care, and policies that help women and men meet the dual demands of work and family. As part of this work, we have long supported tools, such as the Uniform Guidelines, developed to eliminate discriminatory employment practices that too often shut women and people of color out of valuable job opportunities. We support the Commission's decision to submit the Uniform Guidelines, without change, to the Office of Management and Budget, to make clear the importance of preserving accurate records about job applicants, providing for consistency in employer recordkeeping, and ensuring job applicants are treated fairly when looking for work.

The Uniform Guidelines Help Ensure Consistency in Recordkeeping Practices. The Uniform Guidelines play a critical role in providing much-needed direction to federal contractors and employers by ensuring that the selection procedures used to hire employees are fair, appropriate, precise, and free from discrimination. A particularly important aspect of the Uniform Guidelines is that they require employers to keep records about job applicants, including information on the race and gender composition of the applicant pool. These recordkeeping rules are a crucial part of ensuring fairness in

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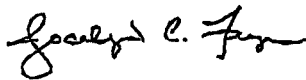
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the hiring process. In particular, they make clear employers' obligations to retain comprehensive records, and to evaluate their hiring decisions to guard against discrimination in their job selection practices. The proposed information collection will have practical utility by extending a consistent, uniform approach for employers to use in establishing their internal recordkeeping procedures.

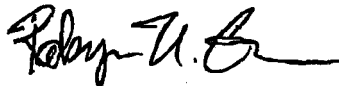
Future Guidance. We support the Commission's approach—submitting the Uniform Guidelines without change and maintaining the status quo—as a better alternative to endorsing changes previously adopted by the Department of Labor. We encourage the Commission to continue its evaluation of this issue to assess the necessity for additional guidance in the future on employer recordkeeping obligations.

Thank you for the opportunity to submit these comments on this important matter.

Sincerely,



Jocelyn C. Frye
General Counsel



Robyn N. Carr
Policy Counsel/Women's Law and Public Policy Fellow