PUBLIC SUBMISSION

As of: 6/6/19 2:55 PM Received: April 16, 2019 Status: Posted Posted: April 19, 2019 Tracking No. 1k3-99dr-sdfn Comments Due: June 11, 2019 Submission Type: Web

Docket: OFCCP-2019-0002 Supply and Service Program

Comment On: OFCCP-2019-0002-0001 Agency Information Collection Activities; Proposals, Submissions, and Approvals: Supply and Service Program

Document: OFCCP-2019-0002-0008 Comment on FR Doc # 2019-07251

Submitter Information

Name: Anonymous Anonymous Organization: Federal Contractors Association

General Comment

Compensation is so different within different companies as it often depends on the nature of the business activities. For example, even within a services contractor professionals can be technical verses non-technical. national market Survey data supports the fact that there is about a 15% difference in salary between tech Vs,.non technical positions. The current collection methodology lumps all professionals into one category so no difference is recognized between tech vs non tech positions. Same thing holds true for 1.2 FOM's there are both tech and non-tech.

There are more females in the non tech jobs which would lead one to believe that once again males are paid at a higher rate for professional jobs without taking into account the actual job skills and academic requirements and required years of experience required for the job. Adding all of that would result in a more meaningful analysis. The notion that all of the can be accounted for with a statistical model is absurd. It is like saying "and then a miracle happens" and our collected data is now relevant for our compensation analysis/review.