



January 17, 2012

Nora Kincaid  
Bureau of Labor Statistics Clearance Officer  
Division of Management Systems  
Bureau of Labor Statistics  
U.S. Department of Labor  
Room 4080  
2 Massachusetts Avenue N.E.  
Washington, DC 20212  
Submitted via facsimile: (202) 691-5111

Re: AAUW comments on proposed revisions to the national compensation survey

Dear Ms. Kincaid:

On behalf of the nearly 100,000 bipartisan members and donors of the American Association of University Women (AAUW), I am pleased to share AAUW's comments on proposed revisions to the National Compensation Survey (NCS). The NCS is an ongoing survey of earnings and benefits among private firms, state, and local government. The proposed revision would substitute the Occupational Employment Statistics (OES) and the Employment Cost Index programs for the Locality Pay Survey (LPS) in order to expand the NCS's ability to estimate the prevailing national pay gap.<sup>1</sup>

AAUW supports the proposed revisions to the NCS, particularly since the revision will expand the Bureau of Labor Statistics' ability to assess our nation's pay gap. AAUW has long fought to end wage discrimination, and is committed to supporting "fairness in compensation, equitable access and advancement in employment, and vigorous enforcement of employment antidiscrimination statutes."<sup>2</sup>

AAUW suggests that revisions to the NCS also include demographic breakdowns of each category. Employers already know and report how many employees work full- or part-time, receive early retirement or disability benefits, or are members of a union. They should also be required to report the demographics of this data by gender, race and ethnicity. AAUW believes that requiring employers to submit this information would not be a further burden, and would assist in identifying the scope of the pay gap, as well as factors contributing to this gap.

**The pay gap is real**

Pay disparities are not limited to one career or to one demographic, and affect women of all ages, races, and education levels—regardless of their family decisions and whether they have children. According to the U.S. Census Bureau

and Bureau of Labor statistics, women who work full time earn about 77 cents for every dollar men earn.<sup>3</sup> Because of the wage gap, since 1960, the real median earnings of women have fallen short by more than half a million dollars compared to men.<sup>4</sup> Minority women face a larger wage gap. Compared to white men, African American women make 70 cents on the dollar (African American men make 74 cents); Hispanic or Latina women make about 60 cents (Hispanic men make almost 66 cents).<sup>5</sup>

The wage gap has real consequences. With 71.7 million women in the workforce,<sup>6</sup> wage discrimination hurts the majority of American families. Furthermore, women are increasingly the primary breadwinners in their households (22% in 2007, up from 4% in 1970).<sup>7</sup> In an economic recession with high unemployment in which more women than ever before are the sole or primary sources of household income, the wage gap is undermining families' economic security and our nation's economic competitiveness.

AAUW submits that BLS should require employers to report NCS data cross-tabulated by gender, race and ethnicity, because it will contribute to our understanding of where the pay gap exists among individual employers and industries. Thank you for the opportunity to submit comments on this important issue. I look forward to working with you to close our nation's pay gap. If you have any questions, please feel free to contact me at 202-785-7720, or Beth Scott, regulatory affairs manager, at 202-728-7617.

Sincerely,



Lisa M. Maatz  
Director, Public Policy and Government Relations

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<sup>1</sup> The Federal Register. (November 16, 2011). *Volume 76, Number 221*. Retrieved January 5, 2012, from [www.gpo.gov/fdsys/pkg/FR-2011-11-16/html/2011-29534.htm](http://www.gpo.gov/fdsys/pkg/FR-2011-11-16/html/2011-29534.htm)

<sup>2</sup> American Association of University Women. (June 2011). *2011-13 AAUW Public Policy Program*. Retrieved January 5, 2012, from [www.aauw.org/act/issue\\_advocacy/principles\\_priorities.cfm](http://www.aauw.org/act/issue_advocacy/principles_priorities.cfm)

<sup>3</sup> U.S. Census Bureau. (2009). *Income, Poverty, and Health Insurance Coverage in the United States: 2008, Table A-2*. Retrieved January 5, 2012, from [www.census.gov/prod/2009pubs/p60-236.pdf](http://www.census.gov/prod/2009pubs/p60-236.pdf)

<sup>4</sup> National Committee on Pay Equity. (September 2007). *The Wage Gap Over Time: In Real Dollars, Women See a Continuing Gap*. Retrieved January 5, 2012, from [www.pay-equity.org/info-time.html](http://www.pay-equity.org/info-time.html)

<sup>5</sup> American Association of University Women. (April 2011). *The Simple Truth About the Gender Pay Gap*. Retrieved January 5, 2012, from <http://aauw.org/learn/research/upload/SimpleTruthAboutPayGap1.pdf>

<sup>6</sup> U.S. Department of Labor, Women's Bureau. (2009). *Employment Status of Women and Men in 2008*. Retrieved January 5, 2012, from [www.dol.gov/wb/factsheets/Qf-ESWM08\\_txt.htm](http://www.dol.gov/wb/factsheets/Qf-ESWM08_txt.htm)

<sup>7</sup> Pew Research Center. (January 19 2010). *New Economics of Marriage: The Rise of Wives*. Retrieved January 5, 2012, from <http://pewresearch.org/pubs/1466/economics-marriage-rise-of-wives>