



January 14, 2008

VIA FACSIMILE

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

**RE: Agency Information Collection Activities Comments-72 Fed. Reg. 64219 (Nov. 15, 2007)**

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 of demographic information on applicants for federal employment (Agency Information Collection Activities: Proposed Collection; Comment Request, 72 Fed. Reg. 64219 (Nov. 15, 2007), hereinafter referenced as proposed data collection). The proposed data collection seeks detailed demographic data from federal job applicants that could be used to gain a better understanding of the effectiveness of federal employment efforts. We believe it is crucial to collect accurate demographic data about applicants for federal employment to ensure applicants are treated fairly; evaluate federal recruitment efforts; and identify racial, ethnic, or other disparities within the federal workforce. Thus, we support the proposed data collection and encourage the Commission to explore future ways to improve the quality of demographic data on federal employment.

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. In particular, the National Partnership devotes significant resources to combating sex, race, and other forms of invidious workplace discrimination to ensure equal employment opportunities for women and people of color. Because effective civil rights enforcement often hinges on obtaining accurate and comprehensive data, the National Partnership has an enormous interest in making certain that information collected about workforce composition is comprehensive, detailed, and precise.

**More Accurate Data About Applicants.** The proposed data collection will gather information about the race, national origin, sex, and disability of applicants for federal employment. Importantly, the proposed form used to collect the data will permit individuals to include both

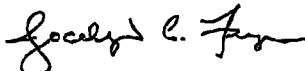
their race and ethnic origin, and check multiple racial categories where appropriate. This feature allows individuals to provide a more accurate description of their backgrounds. It also helps provide a clearer picture of the results of federal hiring efforts. A data collection document that enables individuals to indicate fully their ethnicity and racial background, including multiple races, is an important step forward. Such flexibility is essential – without it, individuals would be forced to pick and choose which demographic characteristics to identify, or select broad categories that do not allow for a detailed breakdown, for example, where multiple racial affiliations might be applicable. Lumping individuals into such broad categories often has the practical effect of diluting the numbers of racial minorities in the underlying labor pool and ultimately making any analysis of the numbers of limited utility. Further, the collection of more inclusive, complete data regarding the racial and ethnic backgrounds of individuals will allow for a more refined analysis of workforce composition, and enable civil rights enforcement officials and advocates alike to properly scrutinize workplace practices. We strongly support efforts to ensure the collection of more detailed information about the federal workforce and, thus, we support the proposed data collection now pending.

**Strengthening Federal Equal Employment Enforcement Efforts.** Comprehensive data collection is critical to ensuring equal employment opportunity and vigorous enforcement of employment discrimination laws. Such information is used to analyze who is and is not hired, the diversity of an applicant pool, and the overall demographic composition of the federal workforce. The data gathered through the proposed data collection will help identify potential racial or ethnic disparities in the workforce and areas where targeted recruitment is needed. The proposed data collection also may help uncover unique barriers to employment faced by particular groups. Better quality data is crucial to helping the Commission achieve its primary function of preventing unlawful employment practices under Title VII of the Civil Rights Act of 1964, as well as other federal anti-discrimination statutes.

We support the collection of comprehensive data to help paint a clear and accurate picture of federal workforce demographics, and provide better information for federal equal employment enforcement efforts. We urge the adoption of the proposed data collection and strongly encourage the Commission to pursue other initiatives to improve the quality and accuracy of workforce data.

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

Sincerely,



Jocelyn C. Frye  
General Counsel



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

 National Partnership  
for Women & Families

FAX COVER SHEET

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ORGANIZATION: Equal Employment Opportunity Commission

FROM: Jocelyn C. Frye (General Counsel) & Robyn N. Carr (Policy Counsel)

DATE: 1/14/08

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COMMENTS: RE: Agency Information Collection Activities Comments -  
72 Fed. Reg. 64219 (Nov. 15, 2007)

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