

Agency Review and Certification of Independent Pay System Compensation Practices

Please provide the requested information below to document the results of your agency's review of compensation practices in your agency's independent pay systems to advance pay equity. Please do not respond by providing copies of agency policies. A complete response will include information on the results of your review including any need for further analysis and study. OPM will review data reported to central systems to supplement agency reviews.

List of Major Independent Agency Pay Systems

Identify each separate independent pay system that applies to employees in your agency, excluding Governmentwide pay systems established under title 5 of the United States Code (the General Schedule, Federal Wage System, Senior Executive Service, senior-level and scientific and professional, Administrative Appeals Judge, and Administrative Law Judge pay systems). Only list pay systems covering more than 100 employees as of the date of your analysis or reporting. Agencies with pay systems covering 100 or fewer employees are encouraged to conduct this review but do not need to provide the results of the review to OPM. For each pay system, provide:

1. The name of the system or a brief description
2. Pay plan code(s)
3. Legal authority (original public law, amending laws, and any current U.S. code citation)
4. Description of employees who are covered by the system (e.g., describe whether the pay system's coverage is limited to a certain part of the agency or to certain types of occupations)

Executive-Level Summary

For each pay system or pay authority listed above, review your agency's compensation regulations, policies, and practices. During your review, consider your agency's actions under section 4 of EO 14035 and the Governmentwide Strategic Plan to Advance DEIA in the Federal Workforce. As appropriate and consistent with applicable law, revise compensation practices to address any pay inequities and advance equal pay. For example, the Governmentwide Strategic Plan lists "establishing policies that do not rely

solely on prior salary history to set pay and establishing a process to communicate salary bands for job applicants” as steps agencies can take as part of the equity roadmap it contains. Further, the President, through EO 14035 and EO 14069, directs OPM to consider prohibiting setting pay based on salary history, which OPM has concluded is appropriate. Under [final regulations](#) on advancing pay equity in Governmentwide pay systems, for individuals receiving their first appointment as a civilian employee of the Federal Government, agencies will not be able to set pay based on salary history, and agencies will be required to have policies regarding setting pay based on a previous Federal salary for employees who have previous civilian service in the Federal Government. OPM also recommends agencies conduct a pay gap data analysis of their independent pay systems (as described in Attachment 2).

In addition to the certification requested below, please provide an executive-level summary of your findings resulting from your review for each of the major independent pay systems your agency administers. These executive summaries should be limited to no more than 1-2 pages for each pay system and should highlight significant findings and any changes to compensation practices recommended and adopted to address any pay inequities and advance equal pay in the agency. These executive summaries may be included in the report that OPM will submit to the President under section 12 of EO 14035.

Certification of Independent Pay System(s) Review

Please read the information below and check one of the two boxes to certify your agency’s review of its independent pay system’s regulations and guidance. Sign and date the form and provide the contact information requested below. The certification form must be signed by (1) the Chief Human Capital Officer (CHCO), Human Resources (HR) Director, or an official at your agency’s headquarters level who is authorized to sign on behalf of the CHCO or HR Director, **and** (2) the Chief Diversity Officer (CDO), Diversity and Inclusion Officer (DIO), or an official at your agency’s headquarters level who is authorized to sign on behalf of the CDO or DIO. Each agency should submit only one certification form for all of its independent pay system(s). Email a copy of the completed certification form, list of independent pay systems, and your executive summaries described above to paypolicy@opm.gov.

Attachment 1: Independent Pay System Review and Certification

My agency has reviewed and revised, as appropriate, its compensation practices for its independent pay systems as required by and consistent with section 12 of EO 14035 on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce. A list of the pay systems and executive summary of the review are attached.

My agency does not administer any independent pay systems or any independent pay systems that cover more than 100 employees.

Agency:

Certifying Officials:

CHCO/HR Director/Authorizing Official

Name:

Title:

CDO/DIO/Authorized Official

Name:

Title:

Agency Contact Point

Name:

Title:

Email address: