



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

The Director

Thursday, July 30, 2015  
CPM 2015-08

**MEMORANDUM FOR: Chief Human Capital Officers**

FROM: BETH F. COBERT ACTING DIRECTOR

Subject: Additional Guidance on Advancing Pay Equality in the Federal Government

In April 2014, the U.S. Office of Personnel Management (OPM) issued a report, "Governmentwide Strategy on Advancing Pay Equality in the Federal Government," at the direction of President Obama in his May 2013 memorandum "[Advancing Pay Equality in the Federal Government and Learning from Successful Practices](#)."

In our Governmentwide strategy, we committed to working with agencies to determine where guidance may be needed on the use of General Schedule pay-setting flexibilities and on conducting gender data analysis. This memorandum transmits our new guidance and summarizes other recent OPM activities related to commitments made in the Governmentwide strategy.

**General Schedule Pay-Setting Flexibilities**

In our study of the gender pay gap in the Federal workforce, we found that some agencies require the use of a job candidate's existing salary or that existing salary must be considered when setting pay of a new General Schedule employee. Reliance on existing salary to set pay could potentially adversely affect a candidate who is returning to the workplace after having taken extended time off from his or her career or for whom an existing rate of pay is not reflective of the candidate's current qualifications or existing labor market conditions.

We revised our fact sheet on the General Schedule superior qualifications and special needs pay-setting authority at <http://www.opm.gov/policy-data-oversight/pay-leave/pay-administration/fact-sheets/superior-qualifications-and-special-needs-pay-setting-authority/> to remind agencies that existing salary is only one factor an agency may use when setting pay under this authority and to clarify the regulatory criteria. We added information about determining whether the candidate has superior qualifications, whether the agency has a special need for the candidate's services, and the full range of factors to consider when setting pay beyond existing salary. The revised fact sheet also refers to agency policies and the fact that a determination cannot be made retroactively.

## Conducting Gender Pay Data Analysis

OPM recommends agencies conduct their own gender data analysis similar to that conducted by OPM for the Governmentwide strategy. The purpose of conducting this analysis is to:

1. Identify areas where potential gender-related pay disparities exist within your agency;
2. Determine if there are identifiable, and statistically significant, reasons for those disparities; and
3. Provide a basis for the development of targeted strategies to reduce gender-related pay disparities, to the extent possible.

In addition, we recommend that your agency develop a plan for conducting ongoing data analysis related to gender pay equality on a regular and recurring basis to remain focused on addressing this important issue and to measure progress in closing the gender pay gap. The attachment describes OPM's Governmentwide data analysis process and can serve as a guide for your agency to use while conducting your own analysis. We encourage you to fine-tune your analysis to best capture the demographics of your agency. A more detailed description of the process OPM used to conduct our gender pay analysis for the April 2014 report can be obtained by emailing the Pay and Leave office at [pay-leave-policy@opm.gov](mailto:pay-leave-policy@opm.gov).

## Other Recent Activities

Over the last year, OPM has worked with agencies to implement a number of recommendations in our Governmentwide strategy. As a reminder, a few of our accomplishments include:

- Partnered with agencies to identify gender pay gap issues as they pertain to classification practices and to provide guidance and support related to challenges agencies identified in the application of the General Schedule classification system;
- Provided two interagency webinars—[Best Practices for Recruiting and Hiring Women into STEM Occupations](#) and [Best Practices for Recruiting and Hiring Women into Leadership Positions](#);
- Launched the HR University Recruitment Policy Studio for human resources professionals and hiring officials, which provides information, tools, and best practices on how to attract, recruit, and retain a diverse workforce. The Studio also has a section for job seekers;
- Promoted salary transparency by coordinating with agencies to post their independent salary tables or rate ranges, and posting a new fact sheet on [Expert and Consultant Pay](#);
- Conducted multiple Executive Women in Motion flash-mentoring sessions, including sessions in Baltimore, MD, and Washington, DC, focusing on the pathway to the Senior Executive Service; and
- Issued the [Handbook on Leave and Workplace Flexibilities for Childbirth, Adoption, and Foster Care](#) and the [Handbook on Workplace Flexibilities and Work-Life Programs for Elder Care](#) to provide guidance to Federal agencies and employees on leave and workplace flexibilities for childbirth, adoption, and foster care, and elder care, respectively, including encouraging the use of part-time employment and job sharing arrangements.

**Additional Information**

Agency headquarter-level human resources offices may contact the Pay and Leave office at OPM at [pay-leave-policy@opm.gov](mailto:pay-leave-policy@opm.gov) or (202) 606-2858 for additional information on OPM's gender pay equality activities. Employees should contact their agency human resources office for further information regarding this memorandum.

cc: Human Resource Directors