



RECOMMENDATIONS FOR HIGHER EDUCATION INSTITUTIONS

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Colleges and universities are facing an increasingly complex environment when it comes to affirmative action in employment and evaluating pay equity. The Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) expects full compliance with federal affirmative action regulations. Additionally, faculty, staff, students, and the public expect equitable pay practices. Our experience in affirmative action in employment and pay equity for higher education institutions makes DCI a valuable partner.

Affirmative Action in Employment

- Prepare for OFCCP's "campus-like settings" requirement
- Understand and document the compensation practices and policies that affect various employee groups
- Consider how reporting may differ between faculty and non-faculty and/or tenured and non-tenured employees
- Determine whether and how to report non-traditional workers such as graduate assistants or research fellows
- Evaluate whether a Functional Affirmative Action Plan (FAAP) structure is more appropriate than an establishment-based structure
- Understand the various sources of employment availability data to help create an accurate and helpful availability analysis

Faculty and Staff Pay Equity Studies

- Design a pay equity analysis based on standards established in Title VII of the Civil Rights Act of 1991 for faculty and for staff
- Compare compensation by gender and again by race, accounting for variables such as rank, tenure, education, time in job, and experience
- Conduct a study of the faculty as a whole with the ability to further narrow the analysis by school and rank
- Conduct a study of the staff as a whole
- Consider conducting an adjusted and unadjusted wage gap analysis for staff to identify the percent differences in compensation between men and women and between nonminority and minority employees