Federal Salary Council

1900 E Street NW. Washington, DC 20415-8200

7 NOV 2012

MEMORANDUM FOR: THE PRESIDENT'S PAY AGENT HONORABLE HILDA L. SOLIS HONORABLE JEFFREY ZIENTS HONORABLE JOHN BERRY

SUBJECT:Level of Comparability Payments for January 2014 and OtherMatters Pertaining to the Locality Pay Program

As authorized by the Federal Employees Pay Comparability Act of 1990 (FEPCA), we present our recommendations for the establishment or modification of pay localities, the coverage of salary surveys conducted by the Bureau of Labor Statistics (BLS) for use in the locality pay program, the process of comparing General Schedule (GS) pay to non-Federal pay, and the level of comparability payments for January 2014.

Bureau of Labor Statistics (BLS) Surveys and Pay Gap Methodology

We reviewed comparisons of General Schedule (GS) and non-Federal pay based on new data from the model BLS developed for using Occupational Employment Statistics (OES) data for locality pay (OES/NCS model). BLS developed the model over the last several years as a supplement to the National Compensation Survey (NCS) based on our request to cover more areas. However, the President's budget canceled the NCS and replaced it with the OES/NCS model. Under the budget plan, BLS reduced the NCS sample by roughly half (the other half is used for the Employment Cost Index), effectively canceling the program. BLS delivered the last full NCS data in 2011. BLS provided only OES/NCS modeled data this year.

The pay gaps (i.e., percentage difference between base GS rates and non-Federal pay for the same levels of work) were calculated using the same general weighting and aggregation methods in use since 1994. The BLS survey data cover establishments of all employment sizes.

OES/NCS Model Survey Results

The OES/NCS model estimates how salaries vary by work level from the occupational average based on the remaining NCS sample. Model estimates are applied to OES occupational average salaries by area to produce estimated non-Federal salaries by occupation and work level for each area. BLS can apply the model in locations where it has OES data whether or not the area was covered by a NCS survey.

Over the last several years, we reviewed OES/NCS model test data for the locality pay areas. Attachment 1 shows OES/NCS model pay gap results since 2007 for the existing locality pay areas.

Changes in OES Pay Gaps Over Time

Last year we expressed concerns about sizable increases in the OES/NCS model pay gaps between 2010 and 2011 and recommended the 2011 OES/NCS model results not be used. About 40 percent of the increase in pay gaps was attributable to BLS' reduced NCS sample. The remaining increase was attributable to the Federal pay freeze, the adoption of a new methodology, and other factors. This year, BLS does not have the full NCS sample so the impact of the sample reduction cannot be measured.

While the OES/NCS model produces sizable swings for individual locations in any given year (e.g., Houston increases 12.7 points this year), it was relatively stable on average for tests prior to the 2011 half sample. Since then, even the average gap has fluctuated substantially. As shown in **Attachment 1** and summarized in Table 1 below, the average change in pay gap was 1.05 percentage points from 2007 to 2008, -1.87 points to 2009, and 0.80 points to 2010. The average change jumped to 10.54 points with the 2011 half sample or 6.07 points with the full sample. This year, the average change in pay gaps for current pay areas was 7.54 points, varying from a low of 4.57 points in Hawaii to a high of 12.70 points in Houston.

| | Changes in Pay Gaps Using OES/NCS Model Data (in gap points) | | | | | | |
|----------|--|----------|----------|----------|----------|------------|---------|
| | 07 to 08 | 08 to 09 | 09 to 10 | 10 to 11 | 10 to 11 | 11 Full to | 11 Half |
| | | | | Half | Full | 12 Half | to 12 |
| | | | | | | | Half |
| Average | 1.05 | -1.87 | 0.80 | 10.54 | 6.07 | 7.54 | 3.07 |
| change | | | | | | | |
| Largest | 5.11 | 3.75 | 7.23 | 14.72 | 11.04 | 12.70 | 6.49 |
| increase | | | | | | | |
| Smallest | -1.30 | -5.88 | -4.42 | 5.88 | 2.10 | 4.57 | 0.55 |
| increase | | | | | | | |
| Range of | 6.41 | 9.63 | 11.65 | 8.84 | 8.94 | 8.13 | 5.94 |
| change | | | | | | | |

 Table 1

 Changes in Pay Gaps Using OES/NCS Model Data (in gap points)

The stability of OES/NCS data cannot be compared to the stability of NCS because with NCS, substantial methodology changes were introduced every year since we started using the data and much of the variability in results was likely due to changes in survey methods.

OES/NCS Model Salary Stability

We also examined how the non-Federal salaries changed over time in the OES/NCS model.



The graph shows the percentage of PATCO/grade average salaries that increased more than 0 but less than 5 percent, between 5 and 10 percent, and so on. Increases are displayed for the 2012 half sample (INC12) and the 2011 and 2010 full samples. As can be seen in the graph, changes in non-Federal salaries as measured by the model are normally distributed with most salaries increasing at an annual rate between 0 and 5 percent (what we would expect). The proportion in the 0 to 5 percent range is lowest with the 2012 half sample. However, each year includes a sizable number of observations indicating that salaries have increased or decreased by substantial amounts (what we wouldn't expect). Many of these outliers are in PATCO/grade combinations with few Federal employees such as GS-8 Professional occupations. These have few GS employees and are given little weight in the pay gap calculations. Others are more important to the measurements.

We experimented with dropping data from the 2012 OES/NCS model calculations where the salary changed by plus/minus 20 percent or more, 15 percent, 10 percent, and 7.5 percent. Because of the low weight assigned to most of the occupational/grade categories with the largest changes in salaries, the experiment had little effect on the pay gaps, dropping the gaps an average of 0.9 points excluding data changing by 20 percent or more, 0.28 points for the 15 percent threshold, 0.98 points for the 10 percent threshold, and 1.31 points for the 7.5 percent threshold.

Federal Salary Council Recommendations on Pay Gaps

Although the results appear to be affected by discontinuing half the NCS sample, we recommend using the OES/NCS model data for locality pay in 2014. However, we also continue to believe the full NCS sample should be restored and ask the Pay Agent to reinstate the full NCS sample. We consider the \$9.8 million price tag money well spent in support of 1.5 million GS employees with an annual payroll in excess of \$100 billion.

Locality Rates for 2014

Based on Office of Personnel Management (OPM) staff's calculations, in taking a weighted average of the locality pay gaps as of March 2012 using the OES/NCS model, the overall gap between base GS average salaries (excluding any add-ons such as GS special rates and existing locality payments) and non-Federal average salaries surveyed by BLS in locality pay areas was 61.29 percent. The amount needed to reduce the pay disparity to 5 percent (the target gap) averages 53.61 percent. Taking into account existing locality pay rates averaging 19.79 percent (including Alaska and Hawaii), the overall remaining pay disparity is 34.6 percent under the OES/NCS methodology. The proposed comparability payments for 2014 for each existing locality pay area are shown in **Attachment 2**.

These locality rates would be in addition to the increase in General Schedule base rates under 5 U.S.C. 5303(a). This provision calls for increases in basic pay equal to the percentage increase in the Employment Cost Index, wages and salaries, private industry workers, between September 2011 and September 2012, less half a point. The ECI for September 2012 increased 1.8 percent, so the GS ECI-based increase in 2014 would be 1.3 percent.

New Locality Pay Areas

One advantage of the OES/NCS model is that it can be applied in many more locations than could be surveyed under NCS. In its 2011 report, the Pay Agent asked BLS to produce OES/NCS model data for additional areas this year. The new areas represent all the Core-Based Statistical Areas defined by the Office of Management and Budget in the Rest of U.S. (RUS) that have 2,500 or more GS employees. **Attachment 3** shows pay gaps for these additional areas for a number of years compared to that for the RUS locality pay area. As you can see in the attachment, 12 of these areas consistently show pay gaps averaging more than 10 points above that for the RUS area and therefore warrant consideration as separate locality pay areas. The 10 point cutoff is somewhat arbitrary and we note current locality pay areas are about 20 points above RUS, on average, with the notable exception of Indianapolis, which has consistently been only a point or two above the RUS area since 2007.

If additional areas are added, we recommend they be introduced in rank order from highest to lowest pay gap. However, since there are only 12 areas meeting the criteria, we believe they could all be introduced at once in 2014 provided adequate funding for locality pay increases in 2014. **Attachment 4** shows the 2012 pay gap and proposed locality pay rate for each of the new locations. It also includes an adjustment to remove these locations from the Rest of U.S. pay gap. Note that this adjustment would lower the RUS pay gap and locality rate shown in **Attachment 2**.

Requests to be Included in Existing Pay Areas or to Establish New Locality Pay Areas

| Albany, NY | Albuquerque, NM | Allentown, PA |
|-------------------------------|-------------------------|-------------------------------|
| Austin, TX | Beaumont, TX | Berkshire County, MA |
| Bradford County, PA (oil/gas) | Charleston, SC | Charlottesville, VA |
| Combine Cincinnati, Columbus, | | Claremont, VT (White River |
| Dayton | Clatsop County, OR | Junction) |
| | Fairmont-Clarksburg, WV | |
| Colorado Springs, CO | (oil/gas) | Franklin County, PA (oil/gas) |
| Grand Rapids, MI | Hood River, OR | Lassen County, CA |
| Lincoln County, OR | Los Alamos County, NM | Madison, WI |
| | Mono County, CA—Marine | |
| | Corps Mountain Warfare | |
| Minot, ND (oil/gas) | Center | Morgantown, WV |
| Polk County, TX | Portland, ME | Ripley County, IN |
| Rochester, MN | San Luis Obispo, CA | Sayre, PA (oil/gas) |
| St. Thomas, VI | Starke County, IN | Switzerland County, IN |
| Virginia Beach, VA | | |

OPM staff had contacts from employees in 34 locations by email, telephone, or letter since 2011:

We also received petitions from employees or groups representing Albany, NY; Berkshire County, MA; Bradford County, PA; Newport, OR (Lincoln County); and White River Junction, VT (Claremont CSA). Employees from several of these locations provided oral testimony at Council meetings. In summary, employees in Albany request it be made a separate locality pay area, employees in Berkshire County request it be included in the Hartford locality pay area, employees in Bradford, PA, seek higher pay due to the oil/gas boom (as do employees in western North Dakota and West Virginia), employees in Newport, OR, (Lincoln County) seek higher locality pay due to high living costs, and employees in White River Junction seek to be included in the Boston locality pay area.

None of these locations meet the current criteria (using 2000 Census commuting data) to be included in an existing locality pay area or could be made separate areas using NCS data.

We proposed changes in how locality pay areas are defined in 2010 and 2011, including using newer commuting pattern data but you did not approve the recommendations. Nevertheless, we continue to believe our recommendations in 2010 and 2011 to drop the GS employment criteria entirely and revise the commuting criteria for defining locality pay areas were well founded and should have been approved. We concluded that commuting is the most relevant criterion and measures the degree of economic linkage among areas. The GS employment criterion has always been problematic and hard to justify because it is not based on an economic linkage among geographic locations. While our prior recommendation would not help all of the areas that contacted OPM, they would have helped some of them.

Accordingly, we resubmit our recommendation to drop GS employment as a criterion and increase the single county commuting criterion to 20 percent (instead of 7.5 percent) for evaluating adjacent counties that are not part of a multi-county MSA or CSA. We recommend increasing the commuting criterion for single counties in consideration of dropping the GS employment criterion and to insure counties are included only when there is substantial commuting to/from the pay area which would seriously affect Federal agency recruitment and retention of employees. We also again recommend that, in applying our proposed criteria, CSAs composed entirely of micropolitan areas be treated the same as other CSAs. **Attachments 5 and 6** list locations impacted by these recommendations.

RUS Locations Surrounded by Separate Locality Pay Areas

We note that a number of relatively small locations in the RUS locality pay area would be essentially surrounded by higher paying locality pay areas if all of our recommendations are approved. Such locations include—

- Los Alamos County, NM, which would be completely surrounded by the new Albuquerque-Santa Fe locality pay area;
- Clallam, Jefferson, and San Juan Counties, WA, which would be bordered by the Seattle locality pay area and the ocean if Grays Harbor is added to the Seattle locality pay area;
- Dukes and Nantucket Counties, MA, offshore from the Boston pay area; and
- Berkshire County, MA, which would be just north of the New York pay area, just west of the Hartford pay area, and just east of the Albany pay area.

We believe that because Federal agencies with employees in RUS counties *completely surrounded* by higher-paying areas would likely experience staffing problems, the Pay Agent should add such locations to an adjacent locality pay area. Where multiple pay areas are involved, a county should be added to the pay area with which it has the highest employment interchange rate.

It is less clear to us that all RUS locations that are *almost but not completely* surrounded by higherpaying areas should be added to adjacent locality pay areas; however, we recognize that Federal agencies in RUS counties that are closely located in multiple directions to higher-paying areas may also experience staffing problems. We believe such locations warrant careful consideration by the Pay Agent on a case-by-case basis.

By direction of the Council:

<u>SIGNED</u> Stephen E. Condrey, Ph.D. Chairman

Comparison of the OES/NCS Model Gaps 2007-2012 PAY AREAS

Attachment 1 (page 1)

| | 2007 | 2008 | 2009 | 2010 | | | |
|-------------------|------------|-----------------|----------------------|--------|-----------|-----------|-----------|
| Locality Pay Area | Model | Model | Model | Model | 2011 Half | 2011 Full | 2012 Half |
| ALASKA | 53.32% | 53.99% | 51.26% | 53.99% | 68.71% | 65.03% | 73.47% |
| ATLANTA | 43.74% | 44.95% | 40.96% | 43.42% | 55.82% | 50.04% | 56.82% |
| BOSTON | 59.76% | 61.14% | 58.51% | 56.02% | 66.17% | 61.46% | 69.43% |
| BUFFALO | N/A | 39.74% | 40.12% | 40.23% | 49.77% | 46.37% | 53.19% |
| CHICAGO | 52.80% | 57.91% | 55.38% | 53.68% | 62.63% | 57.40% | 63.48% |
| CINCINNATI | 37.12% | 37.98% | 34.89% | 37.15% | 43.03% | 39.25% | 46.84% |
| CLEVELAND | 38.32% | 40.04% | 39.62% | 38.42% | 46.06% | 41.93% | 46.61% |
| COLUMBUS, OH | 38.63% | 38.01% | 35.85% | 38.19% | 45.04% | 42.23% | 47.92% |
| DALLAS | 46.09% | 47.98% | 44.52% | 46.12% | 56.60% | 51.57% | 60.13% |
| DAYTON | 36.81% | 37.26% | 35.24% | 37.60% | 48.36% | 43.30% | 50.26% |
| DENVER | 59.47% | 59.72% | 57.64% | 58.19% | 66.61% | 60.68% | 69.72% |
| DETROIT | 59.99% | 60.56% | 54.99% | 52.23% | 61.97% | 57.56% | 63.60% |
| HARTFORD | 56.08% | 55.06% | 53.55% | 56.04% | 65.51% | 61.50% | 68.11% |
| HAWAII | 38.35% | 38.65% | 37.51% | 39.19% | 50.58% | 46.82% | 51.39% |
| HOUSTON | 49.75% | 53.38% | 50.82% | 53.12% | 66.43% | 60.22% | 72.92% |
| HUNTSVILLE | 44.53% | 44.73% | 45.70% | 44.72% | 55.97% | 49.39% | 57.88% |
| INDIANAPOLIS | 31.16% | 33.26% | 30.26% | 29.65% | 35.67% | 32.78% | 41.58% |
| LOS ANGELES | 62.27% | 63.66% | 64.31% | 66.33% | 78.49% | 74.07% | 80.28% |
| MIAMI | 43.87% | 45.27% | 42.16% | 40.65% | 50.73% | 46.56% | 52.34% |
| MILWAUKEE | 40.44% | 43.07% | 39.75% | 40.83% | 48.54% | 44.74% | 50.08% |
| MINNEAPOLIS | 46.26% | 48.74% | 47.14% | 47.67% | 56.31% | 52.31% | 58.71% |
| NEW YORK | 65.72% | 66.78% | 64.12% | 65.21% | 77.72% | 72.64% | 81.73% |
| PHILADELPHIA | 52.58% | 53.45% | 50.93% | 52.85% | 64.01% | 59.51% | 68.53% |
| PHOENIX | 36.99% | 38.96% | 36.94% | 39.77% | 50.11% | 46.54% | 53.52% |
| PITTSBURGH | 34.00% | 34.09% | 31.87% | 35.35% | 46.81% | 42.93% | 51.28% |
| PORTLAND, OR | 43.08% | 42.46% | 42.19% | 43.89% | 55.80% | 50.93% | 57.85% |
| RALEIGH | Not includ | ed in earlier t | ests | 35.29% | 46.56% | 43.01% | 50.42% |
| REST OF U.S. | 28.54% | 29.54% | 28.12% | 28.14% | 35.54% | 32.65% | 40.13% |
| RICHMOND | 45.50% | 44.94% | 39.06% | 34.64% | 43.98% | 40.49% | 49.40% |
| SACRAMENTO | 50.91% | 49.61% | 51.13% | 49.76% | 64.00% | 59.81% | 70.00% |
| SAN DIEGO | 56.66% | 56.70% | 60.45% | 67.68% | 80.57% | 76.77% | 81.73% |
| SAN JOSE | 78.12% | 80.05% | 80.92% | 82.41% | 96.11% | 89.99% | 99.50% |
| SEATTLE | 58.31% | 58.73% | 56.89% | 54.80% | 66.59% | 62.83% | 70.65% |
| WASHINGTON DC | 71.14% | 73.20% | 69.18 <mark>%</mark> | 70.40% | 85.09% | 76.72% | 86.76% |

Attachment 1 (Page 2)

| Locality Pay Area | 07 to 08 | 08 to 09 | 09 to 10 | 10 to 11 Half | 10 to 11 Full | 11 F 12 Half | 11 H 12 Half |
|--------------------|-----------|--------------|-----------|---------------|---------------|--------------|--------------|
| ANCHORAGE | 0.67% | -2.73% | 2.73% | 14.72% | 11.04% | 8.44% | 4.76% |
| ATLANTA | 1.21% | -3.99% | 2.46% | 12.40% | 6.62% | 6.78% | 1.00% |
| BOSTON | 1.38% | -2.63% | -2.49% | 10.15% | 5.44% | 7.97% | 3.26% |
| BUFFALO | N/A | 0.38% | 0.11% | 9.54% | 6.14% | 6.82% | 3.42% |
| CHICAGO | 5.11% | -2.53% | -1.70% | 8.95% | 3.72% | 6.08% | 0.85% |
| CINCINNATI | 0.86% | -3.09% | 2.26% | 5.88% | 2.10% | 7.59% | 3.81% |
| CLEVELAND | 1.72% | -0.42% | -1.20% | 7.64% | 3.51% | 4.68% | 0.55% |
| COLUMBUS, OH | -0.62% | -2.16% | 2.34% | 6.85% | 4.04% | 5.69% | 2.88% |
| DALLAS | 1.89% | -3.46% | 1.60% | 10.48% | 5.45% | 8.56% | 3.53% |
| DAYTON | 0.45% | -2.02% | 2.36% | 10.76% | 5.70% | 6.96% | 1.90% |
| DENVER | 0.25% | -2.08% | 0.55% | 8.42% | 2.49% | 9.04% | 3.11% |
| DETROIT | 0.57% | -5.57% | -2.76% | 9.74% | 5.33% | 6.04% | 1.63% |
| HARTFORD | -1.02% | -1.51% | 2.49% | 9.47% | 5.46% | 6.61% | 2.60% |
| HAWAII | 0.30% | -1.14% | 1.68% | 11.39% | 7.63% | 4.57% | 0.81% |
| HOUSTON | 3.63% | -2.56% | 2.30% | 13.31% | 7.10% | 12.70% | 6.49% |
| HUNTSVILLE | 0.20% | 0.97% | -0.98% | 11.25% | 4.67% | 8.49% | 1.91% |
| INDIANAPOLIS | 2.10% | -3.00% | -0.61% | 6.02% | 3.13% | 8.80% | 5.91% |
| LOS ANGELES | 1.39% | 0.65% | 2.02% | 12.16% | 7.74% | 6.21% | 1.79% |
| MIAMI | 1.40% | -3.11% | -1.51% | 10.08% | 5.91% | 5.78% | 1.61% |
| MILWAUKEE | 2.63% | -3.32% | 1.08% | 7.71% | 3.91% | 5.34% | 1.54% |
| MINNEAPOLIS | 2.48% | -1.60% | 0.53% | 8.64% | 4.64% | 6.40% | 2.40% |
| NEW YORK | 1.06% | -2.66% | 1.09% | 12.51% | 7.43% | 9.09% | 4.01% |
| PHILADELPHIA | 0.87% | -2.52% | 1.92% | 11.16% | 6.66% | 9.02% | 4.52% |
| PHOENIX | 1.97% | -2.02% | 2.83% | 10.34% | 6.77% | 6.98% | 3.41% |
| PITTSBURGH | 0.09% | -2.22% | 3.48% | 11.46% | 7.58% | 8.35% | 4.47% |
| PORTLAND, OR | -0.62% | -0.27% | 1.70% | 11.91% | 7.04% | 6.92% | 2.05% |
| RALEIGH | Not inclu | uded in earl | ier tests | 11.27% | 7.72% | 7.41% | 3.86% |
| REST OF U.S. | 1.00% | -1.42% | 0.02% | 7.40% | 4.51% | 7.48% | 4.59% |
| RICHMOND | -0.56% | -5.88% | -4.42% | 9.34% | 5.85% | 8.91% | 5.42% |
| SACRAMENTO | -1.30% | 1.52% | -1.37% | 14.24% | 10.05% | 10.19% | 6.00% |
| SAN DIEGO | 0.04% | 3.75% | 7.23% | 12.89% | 9.09% | 4.96% | 1.16% |
| SAN FRANCISCO | 1.93% | 0.87% | 1.49% | 13.70% | 7.58% | 9.51% | 3.39% |
| SEATTLE | 0.42% | -1.84% | -2.09% | 11.79% | 8.03% | 7.82% | 4.06% |
| WASHINGTON, DC | 2.06% | -4.02% | 1.22% | 14.69% | 6.32% | 10.04% | 1.67% |
| Unweighted average | 1.05% | -1.87% | 0.80% | 10.54% | 6.07% | 7.54% | 3.07% |
| Minimum | -1.30% | -5.88% | -4.42% | 5.88% | 2.10% | 4.57% | 0.55% |
| Maximum | 5.11% | 3.75% | 7.23% | 14.72% | 11.04% | 12.70% | 6.49% |
| Range | 6.41% | 9.63% | 11.65% | 8.84% | 8.94% | 8.13% | 5.94% |

| AREA | March 2012 GS Base | OES/NCS model pay | Recommended locality rate |
|----------------|--------------------|-------------------|---------------------------|
| | Payroll | gap | (target pay gap) |
| | | | |
| | | | |
| Alaska | \$491,487,759 | 73.47% | 65.21% |
| Atlanta | \$1,707,434,372 | 56.82% | 49.35% |
| Boston | \$1,650,219,347 | 69.43% | 61.36% |
| Buffalo | \$306,839,102 | 53.19% | 45.90% |
| Chicago | \$1,358,420,487 | 63.48% | 55.70% |
| Cincinnati | \$448,519,821 | 46.84% | 39.85% |
| Cleveland | \$628,626,852 | 46.61% | 39.63% |
| Columbus | \$560,902,116 | 47.92% | 40.88% |
| Dallas | \$1,260,662,180 | 60.13% | 52.50% |
| Dayton | \$755,322,137 | 50.26% | 43.10% |
| Denver | \$1,250,996,155 | 69.72% | 61.64% |
| Detroit | \$851,727,114 | 63.60% | 55.81% |
| Hartford | \$289,339,458 | 68.11% | 60.10% |
| Hawaii | \$1,004,950,053 | 51.39% | 44.18% |
| Houston | \$877,970,484 | 72.92% | 64.69% |
| Huntsville | \$840,928,645 | 57.88% | 50.36% |
| Indianapolis | \$557,562,531 | 41.58% | 34.84% |
| Los Angeles | \$2,253,619,699 | 80.28% | 71.70% |
| Miami | \$876,101,732 | 52.34% | 45.09% |
| Milwaukee | \$218,987,596 | 50.08% | 42.93% |
| Minneapolis | \$475,459,435 | 58.71% | 51.15% |
| New York | \$3,054,155,702 | 81.73% | 73.08% |
| Philadelphia | \$1,688,669,415 | 68.53% | 60.50% |
| Phoenix | \$555,380,278 | 53.52% | 46.21% |
| Pittsburgh | \$424,874,098 | 51.28% | 44.08% |
| Portland | \$644,172,680 | 57.85% | 50.33% |
| Raleigh | \$951,229,957 | 50.42% | 43.26% |
| Rest Of US | \$34,307,554,189 | 40.13% | 33.46% |
| Richmond | \$607,063,000 | 49.40% | 42.29% |
| Sacramento | \$479,987,290 | 70.00% | 61.90% |
| San Diego | \$1,431,125,236 | 81.73% | 73.08% |
| San Jose | \$1,634,848,857 | 99.50% | 90.00% |
| Seattle | \$1,643,297,379 | 70.65% | 62.52% |
| Washington, DC | \$21,875,105,701 | 86.76% | 77.87% |
| All Pay Areas | \$87,963,540,857 | 61.29% | 53.61% |

Locality Pay Rates for 2014

Attachment 3

OES/NCS Model Pay Gaps 2009-2012 Attachment 3 Area Compared to RUS Index Sample and Latest Delivery 2009 2010 2012 2009 2010 2011 2012 Average Area 2011 Albany 55.34% 13.06% 37.19% 41.30% 48.38% 11.10% 13.07% 12.84% 15.21% 36.40% 43.70% 54.17% 45.88% 10.31% 15.47% 18.63% 12.54% Albuquerque 5.75% Augusta 22.55% 21.53% 28.83% 27.59% -3.54% -6.70% -6.71% -12.54% -7.37% Austin 33.92% 40.91% 48.20% 51.17% 7.83% 12.68% 12.66% 11.04% 11.05% Birmingham 33.41% 37.38% 41.08% 46.18% 7.32% 9.15% 5.54% 6.05% 7.02% -1.25% Boise 33.89% 25.43% 31.32% 34.37% 7.80% -2.80% -4.22% -5.76% Charleston 20.51% 24.77% 35.46% 35.59% -5.58% -3.46% -0.08% -4.54% -3.42% Charlotte 39.99% 47.85% 9.41% 11.76% 12.77% 7.72% 10.42% 35.50% 48.31% Clarksville 15.14% 15.94% 21.09% 23.56% -10.95% -12.29% -14.45% -16.57% -13.57% Colorado Springs 38.54% 38.27% 49.49% 52.99% 12.45% 10.04% 13.95% 12.86% 12.33% 24.22% 30.71% -9.39% -9.42% Columbia 20.15% 26.15% -1.87% -8.08% -7.19% 18.46% 18.90% 23.45% 25.19% -7.63% -9.33% -12.09% -14.94% -11.00% Columbus, GA -1.23% -2.67% Corpus Christi 24.86% 25.56% 37.21% 46.60% 1.67% 6.47% 1.06% Crestview 28.52% 34.42% 40.45% 44.03% 2.43% 6.19% 4.91% 3.90% 4.36% Davenport 39.22% 44.71% 50.10% 46.44% 13.13% 16.48% 14.56% 6.31% 12.62% El Paso 27.93% 27.87% 36.05% 35.61% 1.84% -0.36% 0.51% -4.52% -0.63% Fresno 31.95% 30.52% 38.23% 40.78% 5.86% 2.29% 2.69% 0.65% 2.87% Gulfport 23.91% 24.22% 21.00% 23.54% -2.18% -4.01% -14.54% -16.59% -9.33% Harrisburg 36.32% 40.77% 48.77% 52.18% 10.23% 12.54% 13.23% 12.05% 12.01% -9.26% -14.88% 16.83% 17.22% 20.66% 25.18% -11.01% -14.95% -12.53% Jackson Jacksonville, FL 31.36% 30.70% 37.76% 40.95% 5.27% 2.47% 2.22% 0.82% 2.70% Jacksonville, NC 13.07% 13.01% 25.40% 31.29% -13.02% -15.22% -10.14% -8.84% -11.81% Kansas City 36.31% 38.01% 44.91% 50.03% 10.22% 9.78% 9.37% 9.90% 9.82% Killeen-Temple 13.93% 16.56% 22.47% 33.02% -12.16% -11.67% -13.07% -7.11% -11.00% Laredo 43.25% 44.19% 58.18% 64.25% 17.16% 15.96% 22.64% 24.12% 19.97% Las Cruces 16.55% 31.73% 36.35% 40.14% -9.54% 3.50% 0.81% 0.01% -1.31% Las Vegas 47.46% 50.04% 56.86% 60.41% 21.37% 21.81% 21.32% 20.28% 21.20% Lawton 4.61% 6.46% 10.20% 19.34% -21.48% -21.77% -25.34% -20.79% -22.35% Lexington 17.83% 18.63% 22.37% 25.70% -8.26% -9.60% -13.17% -14.43% -11.37% Little Rock 18.12% 16.55% 23.22% 25.95% -7.97% -11.68% -12.32% -14.18% -11.54% 32.94% -3.73% -3.58% -2.60% -4.72% -3.66% Louisville 22.36% 24.65% 35.41% 27.88% 27.79% 34.25% 41.34% 1.79% -0.44% -1.29% 1.21% 0.32% Macon 32.39% 35.25% 39.81% 40.99% 6.30% 7.02% 4.27% 0.86% 4.61% Madison 14.00% 11.16% 24.68% 26.33% -12.09% -17.07% -10.86% -13.80% -13.46% Manhattan Memphis 29.52% 27.88% 36.67% 39.81% 3.43% -0.35% 1.13% -0.32% 0.97% 27.47% 36.70% -0.76% -1.90% Montgomery 24.15% 34.08% -1.94% -1.46% -3.43% 0.91% -3.69% Nashville 27.00% 28.20% 31.85% 38.24% -0.03% -1.89% -1.18% 44.96% 1.92% 1.09% 4.83% 2.38% New Orleans 28.01% 29.32% 37.20% 1.66% Oklahoma Citv 22.36% 24.76% 36.22% 37.49% -3.47% 0.68% -2.64% -2.29% -3.73% 27.24% 30.76% 41.72% 48.88% 1.15% 2.53% 6.18% 8.75% 4.65% Omaha 29.77% 29.64% 33.28% 36.76% 3.68% 1.41% -2.26% -3.37% -0.14% Orlando Palm Bay 37.26% 42.87% 48.28% 48.75% 11.17% 14.64% 12.74% 8.62% 11.79% Pensacola 15.72% 15.28% 21.50% 26.00% -10.37% -12.95% -14.04% -14.13% -12.87% 32.50% 35.01% 36.80% 40.53% 6.41% 6.78% 1.26% 0.40% 3.71% Portland, ME 29.06% 31.22% 39.08% 42.86% 2.97% 2.99% 3.54% 3.06% Salt Lake City 2.73% 24.12% 29.94% 44.12% 48.73% -1.97% 1.71% 8.58% 8.60% 4.23% San Antonio Savannah 25.74% 28.68% 35.80% 44.29% -0.35% 0.45% 0.26% 4.16% 1.13% 36.32% 38.54% 52.34% 10.23% 12.64% 12.21% 48.18% 10.31% 11.35% St. Louis 2.83% Tampa 33.89% 36.70% 41.67% 42.96% 7.80% 8.47% 6.13% 6.31% 40.07% 37.96% 50.16% 50.52% 13.98% 9.73% 14.62% 10.39% 12.18% Tucson Virginia Beach 33.35% 33.08% 41.53% 47.23% 7.26% 4.85% 5.99% 7.10% 6.30% 24.32% 37.27% 38.73% -4.06% -1.40% -1.38% Yuma 24.17% -1.77% 1.73% Rest of U.S. 26.09% 28.23% 35.54% 40.13% 0.00% 0.00% 0.00% 0.00% 0.00%

Note some pay gaps may vary from earlier deliveries due to sample revisions.

| | | | Recommended |
|------------------|------------------|---------|-------------|
| | March 2012 GS | | (target pav |
| Area | Base Payroll | Pay Gap | gap) |
| Albany | \$166,730,596 | 55.34% | 47.94% |
| Albuquerque | \$510,495,966 | 45.88% | 38.93% |
| Austin | \$366,557,509 | 51.17% | 43.97% |
| Charlotte | \$168,635,266 | 47.85% | 40.81% |
| Colorado Springs | \$561,339,429 | 52.99% | 45.70% |
| Davenport | \$266,360,779 | 46.44% | 39.47% |
| Harrisburg | \$413,576,464 | 52.18% | 44.93% |
| Laredo | \$169,685,744 | 64.25% | 56.43% |
| Las Vegas | \$275,731,172 | 60.41% | 52.77% |
| Palm Bay | \$309,775,047 | 48.75% | 41.67% |
| St. Louis | \$783,335,734 | 52.34% | 45.09% |
| Tucson | \$491,018,021 | 50.52% | 43.35% |
| Subtotal | \$4,483,241,727 | 51.67% | |
| | | | |
| | | | |
| Rest of U.S. | \$34,307,554,189 | 40.13% | 33.46% |
| Adjusted RUS | \$29,824,312,462 | 38.40% | 31.81% |

New Locality Pay Areas

| LOCALITY PAY AREA | ADJACENT METROPOLITAN AREA | 2000 COMMUTE RATE | 2006-2008 COMMUTE RATE |
|-------------------|---|----------------------|------------------------------|
| Atlanta | Athens-Clarke County, GA Metropolitan Statistical Area | 15.31 | 17.59 |
| Atlanta | Columbus-Auburn-Opelika, GA-AL Combined Statistical Area | 6.02 | 7.63 |
| Boston | Claremont-Lebanon, NH-VT Combined Statistical Area | 8.90 | 9.88 |
| Boston | Portland-Lewiston-South Portland, ME Combined Statistical Area | 7.40 | 8.31 |
| Chicago | Ottawa-Streator, IL Micropolitan Statistical Area | 17.39 | 19.70 |
| Chicago | Rockford-Freeport-Rochelle, IL Combined Statistical Area | 9.16 | 11.98 |
| Cincinnati | Maysville, KY Micropolitan Statistical Area | 21.55 | |
| Cleveland | Canton-Massillon, OH Metropolitan Statistical Area | 20.21 | 23.86 |
| Columbus | Mansfield-Bucyrus, OH Combined Statistical Area | 10.68 | 13.99 |
| Detroit | Lansing-East Lansing-Owosso, MI Combined Statistical Area | 9.90 | 10.42 |
| Detroit | Saginaw-Bay City-Saginaw Township North, MI Combined Statistical Area | 8.59 | 9.84 |
| Detroit | Toledo-Fremont, OH Combined Statistical Area | 7.09 | 7.62 |
| Huntsville | Florence-Muscle Shoals, AL Metropolitan Statistical Area | 10.33 | 11.16 |
| Indianapolis | Bloomington, IN Metropolitan Statistical Area | 10.91 | 11.38 |
| Indianapolis | Kokomo-Peru, IN Combined Statistical Area | 11.99 | 11.74 |
| Indianapolis | Lafayette-Frankfort, IN Combined Statistical Area | 6.98 | 9.82 |

Multi-County Metropolitan Areas Added to Existing Pay Areas under Proposed Criteria

| LOCALITY PAY AREA | ADJACENT METROPOLITAN AREA | 2000 COMMUTE RATE | 2006-2008 COMMUTE RATE |
|-------------------|---|----------------------|------------------------------|
| Miami | Port St. Lucie-Sebastian-Vero Beach, FL Combined Statistical Area | 11.60 | 14.52 |
| Milwaukee | Fond du Lac-Beaver Dam, WI Combined Statistical Area | 15.00 | 18.43 |
| Minneapolis | Rochester, MN Metropolitan Statistical Area | 7.40 | 7.69 |
| Philadelphia | Allentown-Bethlehem-Easton, PA-NJ Metropolitan Statistical Area | 10.20 | 11.11 |
| Pittsburgh | Steubenville-Weirton, WV-OH Metropolitan Statistical Area | 12.52 | 15.16 |
| Raleigh | Rocky Mount, NC Metropolitan Statistical Area | 9.32 | 10.31 |
| Washington | Cumberland, MD-WV Metropolitan Statistical Area | 6.94 | 7.99 |
| Total | | | |

| AREA | ADJACENT MET | 2000 COMMUTE | 2006-2008 COMMUTE |
|-------------|--|--------------|----------------------|
| Albuquerque | Santa Fe-Espanola, NM Combined Statistical Area | 11.68% | 13.73% |
| Charlotte | Hickory-Lenoir-Morganton, NC Metropolitan Statistical Area | 10.98% | 14.68% |

| Single Counties Added to | Existing Localit | y Pay Areas unde | r Proposed Criteria |
|--------------------------|------------------|------------------|---------------------|
|--------------------------|------------------|------------------|---------------------|

| LOCALITY PAY AREA | COUNTY CODE | COUNTY NAME | COMMUTE 2000 CENSUS | COMMUTE 2006-2008 |
|----------------------|----------------|--------------------|---------------------------|----------------------|
| Atlanta | 13011 | Banks Co. GA | 38.24 | |
| Atlanta | 01029 | Cleburne Co. AL | 37.02 | |
| Atlanta | 13115 | Floyd Co. GA | 20.85 | 26.33 |
| Atlanta | 13123 | Gilmer Co. GA | 29.49 | 28.28 |
| Atlanta | 13129 | Gordon Co. GA | 18.48 | 23.37 |
| Atlanta | 13137 | Habersham Co. GA | 21.11 | 23.25 |
| Atlanta | 13157 | Jackson Co. GA | 53.24 | 58.62 |
| Atlanta | 13187 | Lumpkin Co. GA | 62.18 | 69.92 |
| Atlanta | 13211 | Morgan Co. GA | 54.18 | |
| Atlanta | 01111 | Randolph Co. AL | 40.04 | 28.52 |
| Atlanta | 13263 | Talbot Co. GA | 45.96 | |
| Atlanta | 13311 | White Co. GA | 39.33 | 43.07 |
| Boston | 33003 | Carroll Co. NH | 25.59 | 26.36 |
| Buffalo | 36121 | Wyoming Co. NY | 39.01 | 41.58 |
| Chicago | 17075 | Iroquois Co. IL | 32.38 | 34.71 |
| Chicago | 18149 | Starke Co. IN | 27.25 | 34.55 |
| Cincinnati | 39001 | Adams Co. OH | 30.12 | 30.36 |
| Cincinnati | 39071 | Highland Co. OH | 40.07 | 40.47 |
| Cincinnati | 21187 | Owen Co. KY | 31.27 | |
| Cincinnati | 18137 | Ripley Co. IN | 53.72 | 55.37 |
| Cincinnati | 10155 | | 10.0- | |
| Cincinnati | 18155 | Switzerland Co. IN | 46.97 | |
| Oleveland | 18161 | | 31.30 | 04.00 |
| Cieveland | 39043 | | 18.77 | 24.32 |
| Cleveland | 39169 | Wayne Co. OH | 24.43 | 25.11 |

| LOCALITY | COUNTY | | COMMUTE 2000 | COMMUTE |
|------------|--------|-------------------|-----------------|-----------|
| PAY AREA | CODE | | CENSUS | 2006-2008 |
| Columbus | 39073 | Hocking Co. OH | 48.27 | 61.74 |
| Columbus | 39091 | Logan Co. OH | 24.02 | 22.21 |
| Columbus | 39119 | Muskingum Co. OH | 17.91 | 20.22 |
| Columbus | 39127 | Perry Co. OH | 50.91 | 61.45 |
| Columbus | 39131 | Pike Co. OH | 32.26 | 32.82 |
| Columbus | 39163 | Vinton Co. OH | 30.21 | |
| Dallas | 40013 | Bryan Co. OK | 27.74 | 22.73 |
| Dallas | 48217 | Hill Co. TX | 29.16 | 30.15 |
| Dallas | 48223 | Hopkins Co. TX | 19.52 | 22.48 |
| Dallas | 48237 | Jack Co. TX | 34.86 | |
| | | | | |
| Dallas | 48337 | Montague Co. TX | 34.23 | |
| Dallas | 48349 | Navarro Co. TX | 27.17 | 31.38 |
| Dallas | 48379 | Rains Co. TX | 53.91 | |
| Dallas | 48467 | Van Zandt Co. TX | 46.36 | 49.02 |
| Dayton | 39149 | Shelby Co. OH | 28.52 | 31.61 |
| Detroit | 26151 | Sanilac Co. MI | 39.09 | 39.06 |
| Detroit | 26157 | Tuscola Co. MI | 24 74 | 24 99 |
| Detroit | 20107 | | 27.77 | 24.00 |
| Houston | 48089 | Colorado Co. TX | 23.21 | 25.84 |
| Houston | 48185 | Grimes Co. TX | 31.74 | 36.55 |
| Houston | 48313 | Madison Co. TX | 25 78 | |
| Houston | 40313 | Polk Co. TX | 23.76 | 32 11 |
| Houston | 48455 | Trinity Co. TX | 39.81 | 52.44 |
| Tibuston | -0-00 | | 00.01 | |
| Houston | 48477 | Washington Co. TX | 19.70 | 22.23 |
| Houston | 48481 | Wharton Co. TX | 29.22 | 33.15 |
| Huntsville | 47103 | Lincoln Co. TN | 27.25 | 31.48 |
| Huntsville | 01095 | Marshall Co. AL | 17.48 | 20.50 |

| | | | COMMUTE | |
|----------------------|----------------|-------------------|----------------|----------------------|
| LOCALITY PAY AREA | COUNTY CODE | COUNTY NAME | 2000 CENSUS | COMMUTE 2006-2008 |
| Indianapolis | 18031 | Decatur Co. IN | 22.94 | 30.33 |
| | | | | |
| Indianapolis | 18035 | Delaware Co. IN | 18.51 | 20.59 |
| Indianapolis | 18045 | Fountain Co. IN | 21.25 | |
| | | | | |
| Indianapolis | 18071 | Jackson Co. IN | 30.11 | 33.64 |
| Indianapolis | 18139 | Rush Co. IN | 53.48 | |
| Milwaukee | 55055 | Jefferson Co. WI | 23.76 | 26.61 |
| Milwaukee | 55127 | Walworth Co. WI | 25.78 | 25.66 |
| Minneapolis | 27065 | Kanabec Co. MN | 37.43 | |
| Minneapolis | 27079 | Le Sueur Co. MN | 38.29 | 51.31 |
| Minneapolis | 27093 | Meeker Co. MN | 54.95 | 63.14 |
| Minneapolis | 27095 | Mille Lacs Co. MN | 58.34 | 65.15 |
| Minneapolis | 27097 | Morrison Co. MN | 29.66 | 31.82 |
| Minneapolis | 27115 | Pine Co. MN | 32.00 | 32.49 |
| Minneapolis | 55095 | Polk Co. WI | 39.27 | 43.77 |
| Minneapolis | 27143 | Sibley Co. MN | 39.67 | |
| Minneapolis | 27147 | Steele Co. MN | 15.53 | 20.70 |
| Minneapolis | 27153 | Todd Co. MN | 16.02 | 21.60 |
| New York | 36105 | Sullivan Co. NY | 40.68 | 37.22 |
| Pittsburgh | 42059 | Greene Co. PA | 43.62 | 45.20 |
| Pittsburgh | 42063 | Indiana Co. PA | 24.45 | 23.19 |
| Portland | 53015 | Cowlitz Co. WA | 22.17 | 31.27 |
| Raleigh | 37033 | Caswell Co. NC | 16.85 | 22.97 |
| Raleigh | 37077 | Granville Co. NC | 62.09 | 65.58 |
| Raleigh | 37105 | Lee Co. NC | 47.77 | 49.20 |

| LOCALITY PAY AREA | COUNTY CODE | COUNTY NAME | COMMUTE 2000 CENSUS | COMMUTE 2006-2008 |
|----------------------|----------------|------------------------|---------------------------|----------------------|
| Raleigh | 37181 | Vance Co. NC | 22.08 | 27.21 |
| Richmond | 51029 | Buckingham Co. VA | 22.24 | |
| Richmond | 51057 | Essex Co. VA | 34.64 | |
| Richmond | 51081 | Greensville Co. VA | 22.75 | |
| Richmond | 51119 | Middlesex Co. VA | 21.87 | |
| Richmond | 51135 | Nottoway Co. VA | 36.25 | |
| Richmond | 51147 | Prince Edward Co. | 22.26 | 10.08 |
| Sacramento | 06003 | Alpine Co. CA | 55.64 | |
| Sacramento | 06005 | Amador Co. CA | 22.02 | 25.15 |
| Sacramento | 06011 | Colusa Co. CA | 25.39 | 30.47 |
| Sacramento | 06091 | Sierra Co. CA | 22.41 | |
| San Jose | 06033 | Lake Co. CA | 17.89 | 20.44 |
| Seattle | 53027 | Grays Harbor Co. WA | 16.06 | 20.06 |
| Seattle | 53041 | Lewis Co. WA | 26.54 | 29.03 |
| Washington | 24011 | Caroline Co. MD | 20.76 | 27.16 |
| Washington | 54031 | Hardy Co. WV | 21.05 | |
| Washington | 24029 | Kent Co. MD | 31.19 | 27.91 |
| Washington | 51113 | Madison Co. VA | 35.37 | |
| Washington | 51137 | Orange Co. VA | 40.00 | 60.65 |
| Washington | 51139 | Page Co. VA | 14.81 | 21.70 |
| Washington | 51157 | Rappahannock Co. VA | 103.14 | |
| Washington | 51171 | Shenandoah Co. VA | 33.68 | 38.39 |
| Washington | 24041 | Talbot Co. MD | 18.65 | 20.03 |

| PAY AREA | NAME | 2000 Commuting | 2006-2008 COMMUTE |
|------------|---------------------|-------------------|----------------------|
| | | | |
| Albany | Greene Co. NY | 45.51% | 46.91% |
| | | | |
| Albany | Hamilton Co. NY | 26.33% | |
| | | | |
| Charlotte | Chesterfield Co. SC | 23.48% | 29.47% |
| | | | |
| Harrisburg | Juniata Co. PA | 28.29% | 28.86% |