

Federal Salary Council

1900 E Street NW.

Washington, DC 20415-8200

January 23, 2014

**MEMORANDUM FOR: THE PRESIDENT'S PAY AGENT
HONORABLE THOMAS E. PEREZ
HONORABLE SYLVIA M. BURWELL
HONORABLE KATHERINE ARCHULETA**

**SUBJECT: Level of Comparability Payments for January 2015 and Other
Matters 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 2015.

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

The Federal Salary Council reviewed comparisons of GS and non-Federal pay based on data from two BLS surveys, the National Compensation Survey (NCS) and the Occupational Employment Statistics (OES) program. BLS reduced the NCS sample over the last several years due to budget constraints, but still collects enough NCS data to assess the impact of level of work on occupational earnings. BLS applies factors derived from the reduced NCS sample to occupational average salaries from OES to estimate occupational earnings by level of work in each locality pay area. We call this measurement process the *NCS/OES model*.

The pay gaps (i.e., percentage differences 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 and described in annual reports of the President's Pay Agent. The BLS survey data cover establishments of all employment sizes.

Locality Rates for 2015

Based on Office of Personnel Management (OPM) staff's calculations, in taking a weighted average of the locality pay gaps as of March 2013 using the NCS/OES 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 62.21 percent. The amount needed to reduce the pay disparity to 5 percent (the target gap) averages 54.49 percent. Taking into account existing locality pay rates averaging 19.83 percent, the overall remaining pay disparity is 35.37 percent. Our recommended comparability payments for 2015 for current and planned locality pay areas are shown in **Attachment 1**.

These locality rates would be in addition to the increase in GS 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 (ECI), wages and salaries, private industry workers, between September 2012 and September 2013, less half a point. The ECI increased 1.8 percent in September 2013, so the GS base pay increase in 2015 would be 1.3 percent.

Restore Full NCS Sample

The Council has recommended in the past that full funding be restored for BLS' National Compensation Survey (NCS) program. NCS is the data source we use to determine how levels of work affect pay, which is central to the locality pay program's pay comparability process. Survey results used in the locality pay program affect pay rates for more than 1.5 million Federal employees, so using adequate data is absolutely critical. Hence, we reiterate our prior recommendation that full funding for NCS be restored.

Defining Locality Pay Areas

The locality pay statute does not specify how locality pay areas should be defined, but does require that:

- Each General Schedule position in the United States and its territories and possessions be included in a locality pay area;
- The boundaries of locality pay areas shall be determined based on appropriate factors which may include local labor market patterns, commuting patterns, and practices of other employers; and
- The establishment or modification of locality pay areas shall be effected by regulations promulgated in accordance with the notice and comment requirements of the Administrative Procedure Act.

How Locality Pay Area Boundaries were First Established

The Council reviewed a substantial amount of data and considered a number of ways to define locality pay areas in 1992-1993 in preparation for the start of locality pay in 1994. These data included distance, transportation features, geography, commuting patterns, similarity in overall population, employment levels, the kinds and sizes of industrial establishments, personal income, and the location of Federal facilities. At that time, we concluded that the existing metropolitan statistical areas (MSAs) established by the Office of Management and Budget (OMB) were suitable as the basis for locality pay areas for the following reasons:

- MSAs were based on important labor market factors, including commuting rates, population size, and population density.
- MSAs already existed, so the Council and the Pay Agent did not have to define them.
- MSAs covered large areas, which would likely reduce controversy about the boundaries.

- All Federal statistical agencies produced data covering MSAs, including BLS salary surveys.

We were also mindful that some counties adjacent to an MSA should be included in the locality pay area, and developed criteria that could be used to evaluate adjacent counties in a consistent and equitable fashion. These counties are called “areas of application.” After much deliberation, the Council based our 1990s criteria on readily available and easily quantified factors relevant to labor markets or important to the Government:

- Adjacent to a locality pay area and currently in the Rest of U.S. (RUS) locality pay area.
- Number of GS employees.
- Commuting rates.
- Population density or percent of population living in urbanized areas.

Criteria for areas of application have since been reviewed and modified over the years.

New Metropolitan Area Definitions in 2003

In 2003, OMB made substantial revisions in its methods for defining metropolitan areas, including—

- Using new categories and terminology for the geographic areas delineated, including introduction of the category/term *Core-Based Statistical Area* (CBSA);
- Incorporating new commuting pattern data from the 2000 census;
- Eliminating population density as a criterion; and
- Changing how commuting patterns were evaluated.

The Council reviewed the new CBSA definitions in 2003 and recommended they be used as the basis for locality pay areas beginning in 2005, and at the same time also recommended changes in the area of application criteria. The President’s Pay Agent agreed, and the 2003 CBSA definitions became the basis for locality pay areas in 2005. The Pay Agent also approved the criteria for areas of application recommended by the Council in 2003. Until February 2013, OMB made only a few small updates to CBSA definitions affecting the locality pay program, which currently uses the CBSA definitions issued in December 2009.

New CBSA Definitions in 2013

In February 2013, OMB released new CBSA definitions based on the 2010 census, updated criteria, and new commuting pattern data from the American Community Survey. OMB delineates CBSAs to provide consistent geographic definitions for Federal agencies to use in publishing statistical data. OMB does not delineate CBSAs specifically for use in the locality pay program or any other non-statistical program, and cautions other agencies to review CBSAs carefully before using them for non-statistical purposes, such as administering the locality pay program.

Because we knew OMB planned to redefine CBSAs based on the 2010 Census, we recommended in 2011 that OPM change its regulations on locality pay areas to tie the definitions to existing December 2009 CBSA definitions. We made this recommendation in order to provide time for the Council and the President's Pay Agent to review the new definitions for possible use in the locality pay program. OPM amended its regulations, and the new CBSA definitions will not affect locality pay areas until the regulations are changed.

OMB currently groups CBSAs into three categories:

- Micropolitan Statistical Areas, where the largest included urban area has a population of 10,000 to 49,999;
- Metropolitan Statistical Areas (MSAs), where the largest included urban area has a population of 50,000 or more; and
- Combined Statistical Areas (CSAs), which are composed of two or more adjacent CBSAs with an employment interchange of at least 15 percent.

Under the CBSA redesign, CBSAs still consist of an urbanized core and surrounding counties having a high level of economic integration with the core. Counties containing the core urbanized areas are called central counties, and commuting levels to/from the central counties is the sole criterion for adding outlying counties to the new CBSAs. (In the 1990s, the criteria for outlying counties also used commuting rates but included criteria on population size and density, which were eliminated in the 2003 redesign.) In the 2013 redesign, the only substantive change OMB made in its methods reduces the commuting criterion for combining CBSAs into CSAs from 25 percent to 15 percent. Prior to the 2013 redesign, CBSAs with 15 to 25 percent commuting were included as a CSA if favored by public opinion. The public opinion factor was eliminated this year, and adjacent CBSAs with a 15 percent or higher commuting interchange rate are automatically combined into a CSA.

Use New CBSAs for Locality Pay

The new CBSAs reflect the most recent information on population distribution and commuting patterns. Since the reasons we adopted CBSAs in the 1990s still apply, the Council recommends the new CBSA definitions be adopted as the basic definitions for locality pay areas. The new CBSA definitions are based on the most recent nationwide data on commuting patterns. Clearly, if a county has a 25 percent commuting rate to or from the core of an MSA-based locality pay area (which continues as the OMB standard for adding outlying counties to MSAs), Federal agencies in the county would likely experience serious recruitment and retention difficulties if the county were not included in the locality pay area. As in the past, we support using the largest defined areas, called Combined Statistical Areas.

Areas That Would Move to a Different Pay Area with the New CBSA Definitions

While we believe the new CBSAs should be adopted, there are several changes in CBSAs that we conclude should not affect locality pay areas. Under the CBSA redesign—

- Windham County, CT, would move from the Hartford locality pay area to the Boston locality pay area, and
- Adams and York Counties, PA, would move from the Washington, DC, locality pay area to the proposed Harrisburg locality pay area.

While the new CBSAs reflect the highest level of commuting, each of these locations also has a relatively high level of commuting to/from the pay area they are currently in. Moving these locations from one pay area to another would be disruptive for agencies and employees and probably result in retained pay for current employees and a two-tiered pay system in affected locations. For purposes of good pay administration and equity for employees whose individual circumstances have not changed, the Council believes they should remain in their current locality pay area.

Areas That Would Move to the Rest of U.S. Pay Area with New CBSA Definitions

There are also a number of counties that fall out of CBSAs comprising a locality pay area that we believe should be retained in their current pay area for the same reasons as discussed above. These counties are listed in the table below.

Areas That Would Move to the Rest of U.S. Pay Area with New CBSA Definitions				
Locality Pay Area	County	Commuting to New CBSA Rate	Commuting to Old CBSA Rate	GS Employees
Atlanta	Chambers, AL	35.44%		1
Cincinnati	Franklin, IN	38.10%		6
Dallas	Delta, TX	49.31%		2
Dallas	Fannin, TX	59.02%		397
Dayton	Preble, OH	38.66%		8
Houston	San Jacinto, TX	71.14%		1
Richmond	Cumberland, VA	42.08%		0
Richmond	King and Queen, VA	61.95%		2
Richmond	Louisa, VA	38.98%		13
Sacramento	Douglas, NV	24.21%		55
Sacramento	Carson City, NV	1.11%	23.79%	421
Washington, DC	Morgan, WV	59.36%		1
Austin	Burnet, TX	21.70%		26
Charlotte	Anson, NC	40.49%		4
St. Louis	Washington, MO	63.99%		19

Current Areas of Application Still Needed

We also include some adjacent areas in locality pay areas. These areas are listed in the locality pay regulations, met the criteria for being included at the time they were added, and should continue to be included in their respective locality pay area. Both the Council and the Pay Agent have concluded that once an area passes the applicable criteria to be included in a locality pay

area, it need not be reevaluated every year. Current areas of application that would need to be retained are listed below.

Current Areas of Application Still Needed	
Locality Pay Area	Current Areas of Application
Boston	Berwick, York County, ME
	Cape Neddick, York County, ME
	Eliot, York County, ME
	Kittery, York County, ME
	Kittery Point, York County, ME
	Portsmouth Naval Shipyard, Kittery, York County, ME
	South Berwick, York County, ME
	York, York County, ME
	York Beach, York County, ME
	York Harbor, York County, ME
Denver	Ft. Collins-Loveland, CO MSA
Hartford	Springfield, MA MSA
Indianapolis	Grant County, IN
Los Angeles	Santa Barbara-Santa Maria-Goleta, CA MSA
	Edwards Air Force Base, CA
Miami	Monroe County, FL
New York	Joint Base McGuire-Dix-Lakehurst
Raleigh	Fayetteville, NC MSA (now a CSA)
	Goldsboro, NC MSA
San Jose	Salinas, CA MSA
Seattle	Whatcom County, WA
Washington, DC	King George County, VA

Areas of Application No Longer Needed

If the new CBSA definitions are adopted, the following areas added to pay areas by regulation in the past no longer need to be listed separately because they are now part of the CSA or MSA comprising the basic locality pay area.

Areas of Application No Longer Needed (Now Included in the Locality Pay Area's Main Metropolitan Area)	
Locality Pay Area	Area of Application
Boston	Barnstable County
Detroit	Lenawee County, MI
Hartford	New London, CT
New York	Monroe County, PA
	Warren County, NJ
Philadelphia	Kent County, DE
	Atlantic County, NJ
	Cape May County, NJ
Portland, OR	Marion County, OR
	Polk County, OR
Raleigh	Federal Correctional Complex, Butner, NC
San Jose	San Joaquin County, CA
Washington, DC	Hagerstown MSA

New Commuting Patterns

We have been using commuting pattern data collected in the 2000 census. Last year the Council reviewed a partial set of commuting pattern data collected under the American Community Survey in 2006 through 2010. These data excluded counties in the United States with populations below 30,000. The Pay Agent did not accept using the data last year because so many counties were excluded. This year, the complete data set is available covering all counties in the country, and we recommend the new data be used for evaluating areas for inclusion in locality pay areas.

Evaluating Areas in the Vicinity of Locality Pay Areas

As in 1992 and 2003, the Council believes that the use of the new CBSA definitions should not be the sole basis for defining locality pay areas and that a need remains to evaluate locations adjacent to existing locality pay areas.

Our current criteria for adding adjacent CBSAs or counties to locality pay areas are:

- For an adjacent multi-county CBSA: 1,500 or more GS employees and an employment interchange rate of at least 7.5 percent.
- For adjacent single counties: 400 or more GS employees and an employment interchange rate of at least 7.5 percent.

For the last several years, we have recommended that the GS employment criterion be dropped because GS employment is not an indicator of linkages among labor markets or other economic linkages among areas. Even though the Pay Agent rejected this recommendation in each of the past three years, the Council continues to believe defining areas of application based solely on commuting patterns is the more proper methodology. Commuting is a strong indicator of connection to a labor market, which is easy to explain to affected employees.

We have also recommended over the last several years that the employment interchange measure for individual counties be increased from 7.5 percent to 20 percent, thus indicating an even stronger economic linkage among areas. Since adjacent CBSAs are more likely to have employment opportunities in the CBSA and thus less commuting to the pay area, the criterion for CBSAs should remain at 7.5 percent for both multi-county and single county CBSAs.

Recommended criteria for evaluating adjacent CBSAs or counties:

- For an adjacent CBSA: an employment interchange rate of at least 7.5 percent.
- For adjacent single counties: an employment interchange rate of at least 20 percent.

Note that the CBSA criteria recommended above would apply to single or multiple county CBSAs.

We also have criteria for evaluating Federal facilities that cross county lines into a separate locality pay area. The Council recommends these criteria remain unchanged and that affected areas remain in their current pay area:

- For Federal facilities that cross locality pay area boundaries: To be included in an adjacent locality pay area, the whole facility must have at least 500 GS employees, with the majority of those employees in the higher-paying locality pay area, or that portion of a Federal facility outside of a higher-paying locality pay area must have at least 750 GS employees, the duty stations of the majority of those employees must be within 10 miles of the separate locality pay area, and a significant number of those employees must commute to work from the higher-paying locality pay area.

Micropolitan Areas

The Council notes there is some controversy about the use of micropolitan statistical areas for locality pay. Micropolitan areas are CBSAs where the largest population center has between 10,000 and 49,999 residents. The Pay Agent concluded it would not use micropolitan areas in the locality pay program except when included in a CSA with one or more metropolitan statistical areas—the Pay Agent believed micropolitan areas are too small with too little economic activity to be considered separately. The Council, on the other hand, recommended in 2003 that micropolitan areas be used if part of any CSA, whether or not an MSA was included. For example, under our view, the Claremont, NH-VT, area—a four county CSA in 2003 composed of two micropolitan areas, would have been considered as a unit. Under the Pay Agent’s view, the Claremont area would not have been considered as a unit but rather evaluated as four separate counties.

This year, presumably due to increased commuting among the components, OMB has redelineated the Claremont, NH-VT CSA into a single four county stand-alone micropolitan area. Under our current criteria, the Claremont area would no longer qualify to be considered as a unit because the same four counties are no longer combined as a CSA but rather into a single Micropolitan Area. To avoid this incongruous result, the Council recommends that multi-county micropolitan areas be recognized for locality pay, not just those in CSAs. Note we propose to continue treating single county micropolitan areas as counties, not CBSAs.

Impact of Changes

Attachment 2 shows counties that would be added to locality pay areas due to adopting 2013 CBSAs as the basis for locality pay areas as we recommend.

Proposed areas of application are shown in **Attachments 3, 4, and 5**:

- **Attachment 3** shows MSAs, CSAs, and multi-county Micropolitan Areas qualifying as areas of application under the proposed CBSA criteria;
- **Attachment 4** shows single-county CBSAs qualifying as areas of application under the proposed CBSA criteria (single-county metropolitan statistical areas, not micropolitan areas, with an employment interchange rate of 7.5 percent or more); and

- **Attachment 5** shows counties qualifying as areas of application under the proposed single-county criteria (single counties that would be added under the proposed criteria, i.e. those which 1) are either in a single-county micropolitan area or are not located in any CBSA and 2) have an employment interchange rate of 20 percent or more.

Under these recommendations about 26,000 GS employees would move from the RUS locality pay area to separate locality pay areas.

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

OPM staff had contacts from employees in 48 locations by email, telephone, or letter since 2012. These locations are listed in the table below.

List of Areas that have Contacted OPM Since 2012 Seeking Higher Locality Pay		
Albany, NY (proposed LPA)	Allentown, PA MSA	Atwater, CA
Austin, TX (proposed LPA)	Beaumont-Port Arthur, TX MSA	Berkshire County, MA
Burlington, VT	Brazos County, TX	Cape Coral, FL CSA
Clallam County, WA	Coconino County, AZ	Colorado Springs, CO MSA (proposed LPA)
Coos County, NH	Dahlonega, GA	Davenport CSA (proposed LPA)
Fort Polk, LA	Glenwood Springs, CO	Grand County, CO
Grand Rapids, MI	Granville County, NC	Greenville, NC
Hampton Roads/VA Beach, VA	Harrisburg, PA CSA (proposed LPA)	Hood River County, OR
Jefferson County, WA	Kern County, CA	Lackawanna County, PA
Lansing, MI	Laredo, TX (proposed LPA)	Lassen County, CA (Herlong prison)
Las Vegas CSA (proposed LPA)	Los Alamos, NM	Midland, TX CSA
Minot, ND (oil region)	Mono County, CA	Portal, ND (oil region)
Portland, ME	Puerto Rico	Rochester, MN
San Antonio, TX	San Diego, CA (combine with LA)	San Luis Obispo County, CA
Washington, DC (regarding splitting from Baltimore)	U.S. Virgin Islands	Watford, ND (oil region)
West Virginia (oil region)	White River Junction, VT	Wilmington, NC MSA

In addition to simple contacts, we also received more detailed petitions from employees or groups representing Albany, NY; Berkshire County, MA; Burlington, VT; oil/gas field areas in North Dakota, 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 proposed Albany or existing Hartford locality pay area, employees in Burlington request it be reviewed separately, employees in the high-cost North Dakota oil fields request higher locality pay in consideration of living costs and high pay in their area, and employees in White River Junction seek to be included in the Boston locality pay area.

Some of these areas would benefit from our other recommendations. For others that do not meet our criteria, the Council recommends that OPM continue to encourage agencies to use other pay

flexibilities such as recruitment, retention, and relocation payments, and special salary rates to ease any staffing problems in these areas.

Surrounded Areas

Last year, we recommended that any location that would be completely surrounded by higher paying areas if our recommendations were adopted be added to the pay area with which it has the highest employment interchange and that partially surrounded areas, such as Berkshire County, MA, be evaluated on a case-by-case basis. The Council reiterates this recommendation. However, it is unclear to us what level of “surrounded”, size of surrounded area, and distance from pay areas constitutes a problem. Hence, we recommend the Pay Agent evaluate these locations on a case-by-case basis, considering such factors as the size of the area, distance to the pay area, transportation facilities among the areas, quit rates, retention rates, and similar factors.

New Pay Areas

The Council recommended 12 new locality pay areas be established for 2014. While the Pay Agent tentatively agreed, work was not completed on the regulations needed to establish the areas, presumably due to the President’s alternative pay plan for 2014 which holds locality pay percentages at 2013 levels. Since work has not been completed on these 12 areas, we request the Pay Agent publish the required proposed and final regulations as soon as possible to establish the 12 new locality pay areas, as the Pay Agent agreed to this recommendation in its report for 2014.

BLS Proposal for Pay Inversions

BLS proposed an enhancement for NCS/OES model this year to control for pay inversions in the model where estimated pay rates might be higher for a lower level of work for a given occupation. We received the proposal late this year while our Working Group was studying new CBSAs, new commuting pattern data, and the results of new pay comparisons and the Council was unable to give it the consideration it merits. Therefore we asked our Working Group to work with OPM and BLS next year to explore this proposal.

Summary of Major Recommendations

In summary, our major recommendations for 2015 include the following:

- We recommend using the 2015 locality rates shown in **Attachment 1**.
- We recommend using, as the basis for locality pay area definitions in 2015, the new metropolitan area definitions issued by the Office of Management and Budget in February 2013. Locality pay areas would, as now, consist of 1) a main metropolitan area forming the *basic locality pay area* and, where the proposed criteria are met, 2) *areas of application*. Areas of application are locations adjacent to the basic locality pay area that meet approved criteria for inclusion in the locality pay area.
- We recommend retaining in their separate locality pay area locations that—

- Are already included in a separate locality pay area as part of the prior metropolitan area comprising the basic locality pay area; and
- Under the February 2013 metropolitan area definitions, would otherwise move out of their current locality pay area to a lower-paying locality pay area.
- We recommend modifying the qualifying criteria for new areas of application but retaining current areas of application in their current locality pay area without additional review.

By direction of the Council:

SIGNED
Stephen E. Condrey, Ph.D.
Chairman

Attachments

Locality Pay Rates for 2015			
Area	March 2013 Base GS Payroll	Pay Gap	Locality rate (target pay gap)
Alaska	\$464,771,118	76.83%	68.41%
Albany	\$167,524,924	55.60%	48.19%
Albuquerque	\$502,850,257	47.52%	40.50%
Atlanta	\$1,716,647,018	57.14%	49.66%
Austin	\$375,923,497	52.54%	45.28%
Boston	\$1,648,377,925	72.36%	64.15%
Buffalo	\$311,732,666	56.76%	49.30%
Charlotte	\$173,356,104	49.19%	42.09%
Chicago	\$1,356,670,888	65.16%	57.30%
Cincinnati	\$445,527,289	46.06%	39.10%
Cleveland	\$631,132,649	46.35%	39.38%
Colorado Springs	\$563,554,642	53.20%	45.90%
Columbus	\$558,159,973	48.41%	41.34%
Dallas	\$1,291,025,259	61.19%	53.51%
Davenport	\$258,273,657	45.48%	38.55%
Dayton	\$744,276,640	50.34%	43.18%
Denver	\$1,257,067,852	70.62%	62.50%
Detroit	\$870,567,110	62.23%	54.50%
Harrisburg	\$410,780,233	51.48%	44.27%
Hartford	\$292,108,264	70.63%	62.50%
Hawaii	\$971,122,991	53.85%	46.52%
Houston	\$887,604,327	76.82%	68.40%
Huntsville	\$839,618,258	59.16%	51.58%
Indianapolis	\$564,985,993	42.26%	35.49%
Laredo	\$176,031,227	65.41%	57.53%
Las Vegas	\$288,448,778	62.66%	54.91%
Los Angeles	\$2,264,870,034	81.73%	73.08%
Miami	\$886,701,156	53.80%	46.48%
Milwaukee	\$223,847,680	54.96%	47.58%
Minneapolis	\$481,252,360	61.22%	53.54%
New York	\$3,051,970,968	85.57%	76.73%
Palm Bay	\$307,115,369	45.19%	38.28%
Philadelphia	\$1,694,305,249	69.94%	61.85%
Phoenix	\$560,256,413	53.98%	46.65%
Pittsburgh	\$427,838,692	53.48%	46.17%
Portland	\$646,699,633	61.74%	54.04%
Raleigh	\$961,903,155	51.40%	44.19%
Rest Of US	\$29,478,969,850	39.81%	33.15%
Richmond	\$618,005,798	50.98%	43.79%
Sacramento	\$486,751,642	67.98%	59.98%
San Diego	\$1,458,708,738	82.45%	73.76%
San Francisco	\$1,625,827,957	101.49%	91.90%
Seattle	\$1,649,989,647	74.78%	66.46%
St. Louis	\$786,324,439	52.45%	45.19%
Tucson	\$507,615,510	49.68%	42.55%
Washington, DC	\$22,084,584,436	85.34%	76.51%
All Pay Areas	\$87,971,678,265	62.21%	54.49%

Additions to Pay Areas that would Result from Use of New CBSA Definitions		
Current Pay Area	Added Counties	GS Employment
Atlanta	Clarke, GA	631
	Gordon, GA	14
	Jackson, GA	28
	Madison, GA	3
	Morgan, GA	3
	Oconee, GA	7
	Oglethorpe, GA	0
Chicago	Bureau, IL	15
	LaSalle, IL	75
	Putnam IL	0
Cincinnati	Mason, KY	15
	Union, IN	0
Cleveland	Carroll, OH	2
	Erie, OH	173
	Huron, OH	8
	Stark, OH	194
	Tuscarawas, OH	63
Columbus	Guernsey, OH	25
	Hocking, OH	1
	Logan, OH	35
	Muskingum, OH	57
	Perry, OH	5
Dallas	Bryan, OK	23
	Hopkins, TX	12
	Navarro, TX	22
Dayton	Shelby, OH	7
Houston	Trinity, TX	1
	Washington, TX	14
	Wharton, TX	12
Huntsville	Marshall, AL	115
Indianapolis	Decatur, IN	16
	Delaware, IN	55
	Jackson, IN	8
Miami	Indian River, FL	117
	Martin, FL	52
	Okeechobee, FL	12
	St. Lucie, FL	346

Additions to Pay Areas that would Result from Use of New CBSA Definitions		
Current Pay Area	Added Counties	GS Employment
Milwaukee	Dodge, WI	48
	Jefferson, WI	38
	Walworth, WI	20
Minneapolis	Le Sueur, MN	4
	Mille Lacs, MN	4
	Sibley, MN	7
New York	Carbon, PA	6
	Lehigh, PA	193
	Northampton, PA	62
Pittsburgh	Brooke, WV	2
	Hancock, WV	1
	Indiana, PA	47
	Jefferson, OH	19
Portland, OR	Benton, OR	433
	Cowlitz, WA	74
	Linn, OR	143
Raleigh	Granville, NC	14
	Lee, NC	62
	Robeson, NC	107
	Scotland, NC	1
	Vance, NC	34
Seattle	Lewis, WA	49
Washington, DC	Dorchester, MD	103
	Franklin, PA	1,120
	Rappahannock, VA	8
	Talbot, MD	27
Albuquerque	Cibola, NM	230
	Los Alamos, NM	77
	Rio Arriba, NM	202
	San Miguel, NM	71
	Santa Fe, NM	628
Davenport	Clinton, IA	11
	Muscatine, IA	16
Las Vegas	Mohave, AZ	195
St. Louis	Marion, IL	6
Tucson	Santa Cruz, AZ	1,722

Adjacent Multi-County Metropolitan Areas with 7.5 Percent or Higher Commuting

Pay Area	Metropolitan Area	Employment Interchange	GS Empl	New Area of Application or Retained?
ATLANTA	Rome-Summersville, GA CSA	27.12%	82	New
BOSTON	Claremont-Lebanon, NH-VT Micropolitan Statistical Area	9.98%	917	New
BOSTON	Portland-Lewiston-South Portland, ME CSA	8.42%	3,723	Retains the portions of York County, ME, that are already in the Boston CSA. Making the rest of the Portland CSA an area of application would add about 790 employees to the Boston locality pay area.
CHARLOTTE	Hickory-Lenoir, NC CSA	13.00%	144	New
CHICAGO	Rockford-Freeport-Rochelle, IL CSA	11.96%	205	New
CLEVELAND	Youngstown-Warren, OH-PA CSA	10.92%	1,013	New
COLORADO SPRINGS	Pueblo-Cañon City, CO CSA	9.20%	1,562	New
COLUMBUS	Mansfield-Ashland-Bucyrus, OH CSA	11.56%	196	New
DAVENPORT	Dixon-Sterling, IL CSA	12.77%	28	New
DAYTON	Lima-Van Wert-Celina, OH CSA	9.79%	175	New
DETROIT	Lansing-East Lansing-Owosso, MI CSA	10.00%	808	New
DETROIT	Saginaw-Midland-Bay City, MI CSA	7.76%	667	New
DETROIT	Toledo-Port Clinton, OH CSA	9.01%	718	New
HARTFORD	Springfield-Greenfield Town, MA CSA	10.17%	1,754	Retained (Now a CSA, but still consists of the same three counties: Franklin, Hampden, and Hampshire, MA)
HUNTSVILLE	Florence-Muscle Shoals, AL MSA	11.49%	125	New
INDIANAPOLIS	Bloomington-Bedford, IN CSA	11.35%	112	New
INDIANAPOLIS	Lafayette-West Lafayette-Frankfort, IN CSA	8.67%	200	New
INDIANAPOLIS	Richmond-Connersville, IN CSA	10.81%	36	New
MINNEAPOLIS	Mankato-New Ulm-North Mankato, MN CSA	12.35%	76	New
PHILADELPHIA	Salisbury, MD-DE MSA	9.94%	362	New
PITTSBURGH	Johnstown-Somerset, PA CSA	10.41%	496	New
PITTSBURGH	Wheeling, WV-OH MSA	14.69%	239	New
RALEIGH	Fayetteville-Lumberton-Laurinburg, NC CSA	7.78%	9,515	Retained, but conversion to CSA adds two counties, Scotland and Robeson Counties, NC, which have a total of 106 GS employees.
RALEIGH	Rocky Mount-Wilson-Roanoke Rapids, NC CSA	10.58%	91	New
SAN FRANCISCO	Modesto-Merced, CA CSA	18.91%	704	New
WASHINGTON, DC	Cumberland, MD-WV MSA	9.95%	340	New

Adjacent Single-County MSAs with 7.5 Percent or Higher Commuting

Pay Area	Place Name	Employment Interchange	GS Empl	Adjacent CBSA	New Area of Application or Retained?
LOS ANGELES	Kern Co. CA	7.95%	1,833	Bakersfield, CA Metropolitan Statistical Area	New (Except the Edwards AFB portion, which has 802 of the 1,833 GS employees))
SEATTLE	Whatcom Co. WA	12.58%	1,059	Bellingham, WA Metropolitan Statistical Area	Retained
MILWAUKEE	Fond du Lac Co. WI	22.92%	36	Fond du Lac, WI Metropolitan Statistical Area	New
DENVER	Larimer Co. CO	26.71%	1,932	Fort Collins, CO Metropolitan Statistical Area	Retained
HUNTSVILLE	Etowah Co. AL	11.01%	120	Gadsden, AL Metropolitan Statistical Area	New
RALEIGH	Wayne Co. NC	10.26%	599	Goldsboro, NC Metropolitan Statistical Area	Retained
DETROIT	Jackson Co. MI	21.93%	45	Jackson, MI Metropolitan Statistical Area	New
HARRISBURG	Lancaster Co. PA	13.65%	153	Lancaster, PA Metropolitan Statistical Area	New
SAN FRANCISCO	Monterey Co. CA	15.87%	2,719	Salinas, CA Metropolitan Statistical Area	Retained
LOS ANGELES	Santa Barbara Co. CA	9.03%	1,932	Santa Maria-Santa Barbara, CA Metropolitan Statistical Area	Retained
MILWAUKEE	Sheboygan Co. WI	13.62%	18	Sheboygan, WI Metropolitan Statistical Area	New
TUCSON	Cochise Co. AZ	8.16%	4,249	Sierra Vista-Douglas, AZ Metropolitan Statistical Area	New

Adjacent Single Counties with 20 Percent or Higher Commuting					
Pay Area	Place Name	Employment Interchange	GS Empl	Feb 2013 Metro Status	New Area of Application or Retained?
ALBANY	Greene Co. NY	49.84%	5	Not in a metro area	New
ALBANY	Hamilton Co. NY	35.44%	3	Not in a metro area	New
ALBUQUERQUE	Mora Co. NM	49.32%	16	Not in a metro area	New
ALBUQUERQUE	Socorro Co. NM	21.41%	119	Not in a metro area	New
ATLANTA	Banks Co. GA	78.97%	1	Not in a metro area	New
ATLANTA	Cleburne Co. AL	35.09%	19	Not in a metro area	New
ATLANTA	Franklin Co. GA	25.87%	0	Not in a metro area	New
ATLANTA	Gilmer Co. GA	27.53%	37	Not in a metro area	New
ATLANTA	Greene Co. GA	36.49%	3	Not in a metro area	New
ATLANTA	Habersham Co. GA	22.78%	35	Cornelia, GA Single County Metropolitan Statistical Area	New
ATLANTA	Lumpkin Co. GA	66.59%	31	Not in a metro area	New
ATLANTA	Putnam Co. GA	24.03%	31	Not in a metro area	New
ATLANTA	Randolph Co. AL	25.94%	3	Not in a metro area	New
ATLANTA	Talbot Co. GA	37.18%	0	Not in a metro area	New
ATLANTA	Taliaferro Co. GA	25.81%	0	Not in a metro area	New
ATLANTA	White Co. GA	38.88%	1	Not in a metro area	New
AUSTIN	Blanco Co. TX	26.16%	36	Not in a metro area	New
AUSTIN	Burnet Co. TX	21.70%	26	Not in a metro area	New
AUSTIN	Lee Co. TX	29.18%	2	Not in a metro area	New
BOSTON	Carroll Co. NH	25.68%	47	Not in a metro area	New
BOSTON	Cheshire Co. NH	20.23%	28	Keene, NH Single County Metropolitan Statistical Area	New

Adjacent Single Counties with 20 Percent or Higher Commuting					
Pay Area	Place Name	Employment Interchange	GS Empl	Feb 2013 Metro Status	New Area of Application or Retained?
BUFFALO	Wyoming Co. NY	43.43%	5	Not in a metro area	New
CHARLOTTE	Anson Co. NC	40.49%	4	Not in a metro area	New
CHARLOTTE	Chesterfield Co. SC	22.22%	17	Not in a metro area	New
CHICAGO	Iroquois Co. IL	34.28%	7	Not in a metro area	New
CHICAGO	Starke Co. IN	31.19%	7	Not in a metro area	New
CINCINNATI	Adams Co. OH	33.24%	1	Not in a metro area	New
CINCINNATI	Fleming Co. KY	24.45%	11	Not in a metro area	New
CINCINNATI	Franklin Co. IN	38.10%	6	Not in a metro area	Retained
CINCINNATI	Highland Co. OH	38.65%	16	Not in a metro area	New
CINCINNATI	Lewis Co. KY	21.70%	1	Not in a metro area	New
CINCINNATI	Owen Co. KY	34.26%	4	Not in a metro area	New
CINCINNATI	Ripley Co. IN	35.58%	6	Not in a metro area	New
CINCINNATI	Robertson Co. KY	41.90%	0	Not in a metro area	New
CINCINNATI	Switzerland Co. IN	48.70%	4	Not in a metro area	New
CLEVELAND	Harrison Co. OH	32.01%	9	Not in a metro area	New
CLEVELAND	Wayne Co. OH	35.51%	74	Wooster, OH Single County Micropolitan Statistical Area	New
COLUMBUS	Coshocton Co. OH	20.80%	7	Coshocton, OH Single County Micropolitan Statistical Area	New
COLUMBUS	Hardin Co. OH	22.92%	7	Not in a metro area	New
COLUMBUS	Morgan Co. OH	34.49%	2	Not in a metro area	New
COLUMBUS	Noble Co. OH	43.65%	0	Not in a metro area	New

Adjacent Single Counties with 20 Percent or Higher Commuting					
Pay Area	Place Name	Employment Interchange	GS Empl	Feb 2013 Metro Status	New Area of Application or Retained?
COLUMBUS	Pike Co. OH	35.41%	28	Not in a metro area	New
COLUMBUS	Vinton Co. OH	35.30%	5	Not in a metro area	New
DALLAS	Atoka Co. OK	22.09%	15	Not in a metro area	New
DALLAS	Bosque Co. TX	22.98%	22	Not in a metro area	New
DALLAS	Delta Co. TX	49.31%	2	Not in a metro area	Retained
DALLAS	Fannin Co. TX	59.02%	397	Not in a metro area	Retained
DALLAS	Franklin Co. TX	24.38%	2	Not in a metro area	New
DALLAS	Hill Co. TX	34.42%	17	Not in a metro area	New
DALLAS	Jack Co. TX	40.87%	3	Not in a metro area	New
DALLAS	Love Co. OK	42.88%	3	Not in a metro area	New
DALLAS	Montague Co. TX	40.64%	6	Not in a metro area	New
DALLAS	Rains Co. TX	60.24%	0	Not in a metro area	New
DALLAS	Van Zandt Co. TX	44.75%	7	Not in a metro area	New
DAVENPORT	Cedar Co. IA	33.40%	55	Not in a metro area	New
DAVENPORT	Jackson Co. IA	25.88%	12	Not in a metro area	New
DAVENPORT	Louisa Co. IA	37.26%	25	Not in a metro area	New
DAYTON	Preble Co. OH	38.66%	8	Not in a metro area	Retained
DETROIT	Sanilac Co. MI	40.48%	8	Not in a metro area	New
DETROIT	Tuscola Co. MI	25.43%	17	Not in a metro area	New
HARRISBURG	Juniata Co. PA	31.04%	22	Not in a metro area	New
HOUSTON	Colorado Co. TX	37.28%	9	Not in a metro area	New

Adjacent Single Counties with 20 Percent or Higher Commuting					
Pay Area	Place Name	Employment Interchange	GS Empl	Feb 2013 Metro Status	New Area of Application or Retained?
HOUSTON	Grimes Co. TX	39.90%	4	Not in a metro area	New
HOUSTON	Polk Co. TX	24.34%	33	Not in a metro area	New
HOUSTON	San Jacinto Co. TX	71.14%	1	Not in a metro area	Retained
HUNTSVILLE	Lincoln Co. TN	31.04%	5	Not in a metro area	New
INDIANAPOLIS	Blackford Co. IN	31.03%	1	Not in a metro area	New
INDIANAPOLIS	Fountain Co. IN	26.59%	3	Not in a metro area	New
INDIANAPOLIS	Parke Co. IN	23.11%	9	Not in a metro area	New
INDIANAPOLIS	Randolph Co. IN	28.33%	1	Not in a metro area	New
INDIANAPOLIS	Rush Co. IN	71.71%	1	Not in a metro area	New
INDIANAPOLIS	Tipton Co. IN	41.34%	0	Not in a metro area	New
MIAMI	Glades Co. FL	32.30%	11	Not in a metro area	New
MINNEAPOLIS	Kanabec Co. MN	47.01%	9	Not in a metro area	New
MINNEAPOLIS	Meeker Co. MN	59.92%	20	Not in a metro area	New
MINNEAPOLIS	Morrison Co. MN	34.80%	158	Not in a metro area	New
MINNEAPOLIS	Pepin Co. WI	20.22%	2	Not in a metro area	New
MINNEAPOLIS	Pine Co. MN	31.52%	201	Not in a metro area	New
MINNEAPOLIS	Polk Co. WI	40.90%	46	Not in a metro area	New
MINNEAPOLIS	Steele Co. MN	21.01%	2	Owatonna, MN Single County Micropolitan Statistical Area	New
NEW YORK	Sullivan Co. NY	37.72%	30	Not in a metro area	New
NEW YORK	Wayne Co. PA	23.29%	356	Not in a metro area	New
PITTSBURGH	Greene Co. PA	47.24%	33	Not in a metro area	New

Adjacent Single Counties with 20 Percent or Higher Commuting					
Pay Area	Place Name	Employment Interchange	GS Empl	Feb 2013 Metro Status	New Area of Application or Retained?
PORTLAND	Wahkiakum Co. WA	41.47%	2	Not in a metro area	New
RALEIGH	Caswell Co. NC	22.56%	1	Not in a metro area	New
RALEIGH	Warren Co. NC	54.84%	1	Not in a metro area	New
RICHMOND	Cumberland Co. VA	42.08%	0	Not in a metro area	Retained
RICHMOND	Essex Co. VA	29.45%	3	Not in a metro area	New
RICHMOND	Greensville Co. VA	26.60%	0	Not in a metro area	New
RICHMOND	King and Queen Co. VA	61.95%	2	Not in a metro area	Retained
RICHMOND	Louisa Co. VA	38.98%	13	Not in a metro area	Retained
RICHMOND	Nottoway Co. VA	41.63%	174	Not in a metro area	New
RICHMOND	Surry Co. VA	37.26%	1	Not in a metro area	New
SACRAMENTO	Alpine Co. CA	23.95%	10	Not in a metro area	New
SACRAMENTO	Amador Co. CA	27.67%	48	Not in a metro area	New
SACRAMENTO	Colusa Co. CA	29.31%	43	Not in a metro area	New
SACRAMENTO	Sierra Co. CA	22.54%	46	Not in a metro area	New
SAN FRANCISCO	Calaveras Co. CA	27.38%	57	Not in a metro area	New
SEATTLE	Grays Harbor Co. WA	22.97%	48	Aberdeen, WA Single County Micropolitan Statistical Area	New
ST. LOUIS	Gasconade Co. MO	33.97%	2	Not in a metro area	New
ST. LOUIS	Greene Co. IL	32.10%	3	Not in a metro area	New
ST. LOUIS	Iron County, MO	37.54%	0	Not in a metro area	New
ST. LOUIS	Madison Co. MO	35.36%	2	Not in a metro area	New

Adjacent Single Counties with 20 Percent or Higher Commuting					
Pay Area	Place Name	Employment Interchange	GS Empl	Feb 2013 Metro Status	New Area of Application or Retained?
ST. LOUIS	Montgomery Co. IL	32.81%	22	Not in a metro area	New
ST. LOUIS	Montgomery Co. MO	38.95%	5	Not in a metro area	New
ST. LOUIS	Pike Co. MO	21.75%	12	Not in a metro area	New
ST. LOUIS	Randolph Co. IL	34.63%	19	Not in a metro area	New
ST. LOUIS	Ste. Genevieve Co. MO	50.27%	2	Not in a metro area	New
ST. LOUIS	Washington Co. IL	47.32%	5	Not in a metro area	New
ST. LOUIS	Washington Co. MO	63.99%	19	Not in a metro area	New
WASHINGTON	Fulton Co. PA	51.64%	2	Not in a metro area	New
WASHINGTON	King George Co. VA	76.39%	1,210	Not in a metro area	Retained
WASHINGTON	Madison Co. VA	38.46%	24	Not in a metro area	New
WASHINGTON	Morgan Co. WV	59.36%	1	Not in a metro area	Retained
WASHINGTON	Orange Co. VA	58.33%	9	Not in a metro area	New
WASHINGTON	Page Co. VA	24.26%	105	Not in a metro area	New
WASHINGTON	Shenandoah Co. VA	40.48%	46	Not in a metro area	New
WASHINGTON, DC	Caroline Co. MD	67.01%	10	Not in a metro area	New
WASHINGTON, DC	Kent Co. MD	32.85%	12	Not in a metro area	New