

CO Pay Equity Official

Dear Sir or Madam,

I have been working with the University of Northern Colorado to ensure their compliance with SB19-085 the Equal Pay For Equal Work Act (EPEWA). This legislation has the goal to “help close the pay gap in Colorado and ensure that employees with similar job duties are paid the same wage rate regardless of sex, or sex plus another protected status”.

Before this legislation was passed, I had consulted with the University to evaluate all of the Exempt positions within the University using the Decision Band Method© (DBM). The Classified positions continued to use the grading system that had been in place and the Faculty used rank to establish a hierarchy and to differentiate positions.

For the exempt positions, we gathered updated job information on all exempt positions using a position description questionnaire. We then used that data to evaluate all the exempt jobs using the Decision Band Method © (DBM). DBM states that all jobs must make decisions and those decisions can be quantified. The first step in DBM is to review all essential duties and to place them in one of 6 bands, ranging from A to F, based on the nature and scope of those duties. There is an algorithm that was developed to assist in the placement of the duties within a particular band that examines the nature and level and was applied to each essential duty.

The second step is to determine the grade. If an employee manages at least 2 employees within the same band then he/she would receive a coordinating grade. If they do not manage at least 2 employees in the same band, they would receive a non-coordinating grade. The final step is to determine the subgrade. The subgrade is based on the complexity of the duties assigned to that role, compared to others in the same band and grade. A subgrade of 2 is the default subgrade with some jobs being less complex and receiving a subgrade of 1, others being more complex and receiving a subgrade of 3, and some being extremely complex and receiving a subgrade of 4 or 5.

After we assigned band/grades/subgrades to all positions, we worked with the University to create job families for as many positions as possible to allow for employee progression within a department or functional area such as Finance or Academic Student Support. This had the additional benefit, when EPEWA was passed, to allow the University to determine which positions were substantially similar.

To ensure compliance with EPEWA, our firm worked with the University to analyze the compensation data to determine if there were any differences by sex for substantially similar positions. The procedures differed between the Exempt staff, the Classified staff and Faculty.

For the Exempt staff, our first step was to sort employees into job families, then by DBM grade and finally by salary. Where there was a difference in salary for employees in the same job family and DBM grade, we investigated to determine the cause. Salary differences could be generally explained by one of the following causes:

- Tenure
- Market (such as a position where there is a scarcity of qualified employees)
- Special Skills

In those cases where we were unable to determine a rationale for the salary difference, the employee’s salary was brought up to the level of the employee within the same job family, DBM grade and tenure that most closely matched their own. Over 60 employees had their salaries adjusted, with a cost of over \$300,000 for all the adjustments.

For the Faculty, we sorted the employee data first by Classification of Instructional Programs (CIP) code, then by rank, and finally by salary to determine if there were any differences by sex for substantially similar positions. The same process that was used for the exempt staff was then applied with the same causes (Tenure, Market, Special Skills) to determine the rationale for any difference for employees in the same CIP code and rank.

For Faculty where we were unable to determine a rationale for the salary difference, the employee's salary was brought up to the level of the employee within the same CIP code and rank. 15 employees had their salaries adjusted, with a cost of over \$100,000 for all the adjustments.

With Classified employees, the employee data was sorted by the job classification, then by pay grade, then by years in position and then by salary to determine if there were any differences by sex for substantially similar positions. The same process that was used for the exempt and Faculty staff was then applied with the same causes (Tenure, Market, Special Skills) to determine the rationale for salary differences for employees in the same grade.

Where we were unable to determine a rationale for the salary difference, the employee's salary was brought up to the level of the employee within the same grade. 39 employees had their salaries adjusted, with a cost of over \$50,000 for all the adjustments

In conducting this rigorous analysis of the employee population, the University has met and exceeded all the requirements of the EPEWA by proactively addressing any differences in pay by sex for substantially similar positions, using defined and consistent criteria, providing documentation and rationale for all changes to pay based on the analysis.

In addition, the University will continue its current practice of announcing all job openings and promotions as well as disclosing the salary range associated with all open positions.

Please let me know if you have any questions about this analysis.

Sincerely,



Mark Goldberg
DDA-HR Principal Consultant
MarkG@daviddrown.com
612-920-3320 ext. 114