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[Blue Collar Wage Survey Made by Department of Defense in the Tidewater Area of Virginia]. FPCD-77-32; B-164515. March 9, 1977. Released March 11, 1977. 2 pp. + 3 enclosures (14 pp.).

Report to Rep. Robert W. Daniel, Jr.; Rep. G. William Whitehurst ; by Robert F. Keller, Acting Comptroller General.

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Congressional Relevance: Rep. Robert W. Daniel, Jr.; Rep. G. William Whitehurst.

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A 1976 blue collar wage survey conducted by the Department of Defense (DOD) in the Tidewater area of Virginia resulted in a wage raise of about six percent. Local employee representatives were dissatisfied with the amount and believed it was predetermined by the DOD before completion of the survey. The following aspects of determining the wage schedule were considered: criteria used in the compilation of wages to determine the wage increase, the trend line used in making the findings, the adequacy of information obtained from the major private organization, the apparent predetermination by responsible officials concerning what the increase would be, and the absence of information available to the Metal Trades Council in view of the confidentiality of certain information. Findings/Conclusions: DOD did comply with legal requirements and met other criteria in conducting the survey. While this particular raise was lower than most other Federal blue-collar raises in the country, no pattern of predetermination by the Department's wage fixing authorities was found. (RRS)

00659.



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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MAR 9 1977

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The Honorable Robert W. Daniel, Jr.
The Honorable G. William Whitehurst
House of Representatives

As requested in your letter of August 20, 1976, we reviewed the 1976 blue collar wage survey made by the Department of Defense in the Tidewater area of Virginia. The survey resulted in a wage raise of about 6 percent. Local employee representatives were dissatisfied with the amount of the increase and believed it was predetermined by the Department of Defense before the survey's completion.


You asked us to determine if the Department of Defense complied with the law in determining the wage schedule, and about the following specific matters which are discussed in the enclosure.

1. The criteria used in the compilation of wages to determine the wage increase.
2. The trend line (or lines) used in making the finding.
3. The adequacy of information obtained from the major private organization.
4. The apparent predetermination made by responsible officials concerning what the increase would be.
5. The absence of information available to the Metal Trades Council in view of the confidentiality of certain information.

FPCD-77-32

B-164515

After reviewing applicable wage legislation, Civil Service Commission guidelines, and the detailed survey data, we conclude that the Department of Defense did comply with legal requirements and met other criteria in conducting the survey. While this particular raise was less than most other Federal blue-collar raises in the country, we did not discern a pattern of predetermination by Department's wage fixing authorities. Comments on this report were obtained from the Department of Defense and have been incorporated.


ACTING Comptroller General
of the United States

Enclosures-3

CRITERIA USED IN THE COMPILATION OF WAGES
TO DETERMINE THE WAGE INCREASE

The Federal Wage System was established by legislation in 1972 (5 U.S.C. 5341) to establish Federal blue collar wages comparable to prevailing wages in the local private sector. Criteria for the wage-setting process are contained in supplement 532-1 of the Federal Personnel Manual. These detailed policies and procedures are prescribed by the Civil Service Commission with the advice of the Federal Prevailing Rate Advisory Committee, other executive agencies, and labor organizations.

Since the Department of Defense (DOD) has most of the Government's blue collar employees it sets their wages in most areas in the country, including the Tidewater area in Virginia. The Department of Defense Wage Fixing Authority, which sets wages, includes: the Assistant Secretary of Defense for Manpower and Reserve Affairs, the Deputy Assistant Secretary for Civilian Personnel Policy, a wage committee and a technical staff. The wage committee consists of

- the Deputy Assistant Secretary of Defense for Civilian Personnel Policy or a designate, as chairman,
- two members from the military departments, representing management, and
- two members representing labor; one from the Metal Trades Department, AFL-CIO, and one from the American Federation of Government Employees.

A primary purpose of the committee is to recommend wage schedules to the Assistant Secretary of Defense for Manpower and Reserve Affairs. A majority vote of the committee constitutes a recommendation, but minority reports may be submitted. The technical staff is composed of wage specialists, analysts, and clerical staff. Among the staff's duties are the tabulation of local survey results and proposal of a wage schedule to the wage committee.

Local wage survey committees are also appointed for the duration of a survey. The committee oversees local procedures and data collectors and submits raw data to the technical staff. Local committees consist of a chairman, an agency representative, and a labor member. Local committee decisions are also determined by majority vote, but minority reports may be submitted.

Survey design

The Federal Personnel Manual specifies which industries must be surveyed. These are all manufacturing, transportation and communication industries; public utilities and wholesale trades. None may be omitted but industries may be added if they and the Federal sector have a significant number of similar jobs. In the Tidewater survey retail grocery stores were added at request of the local committee because the stores had jobs similar to a large number of employees' jobs in the military commissaries in the area.

Selection of firms is done by the Department of Labor's Bureau of Labor Statistics using standard statistical sampling techniques. In this case, because of the large number of Federal shipbuilding and aircraft jobs in the area, all such firms in those two industries were included rather than left to the chance of random selection. The sample consisted of 81 establishments employing over 50,000 people.

The Federal Personnel Manual requires 22 specific jobs to be surveyed which represent a wide range of skills and responsibilities common to industry and Government. Other jobs may be added if there are believed to be a significant number in both the local Federal and private sectors. The local committee felt that five jobs qualified and they were approved by the DOD wage committee. The 27 required and added jobs surveyed were as follows.

<u>Job</u>	<u>Grade</u>	<u>Job</u>	<u>Grade</u>
<u>Required</u>			
Janitor (light)	1	Automotive mechanic	10
Janitor	2	Sheet metal mechanic	10
Material handler	2	Pipefitter	10
Maintenance laborer	3	Welder	10
Packer	4	Machinist	10
Helper (trades)	5	Electronics mechanic	11
Warehouseman	5	Toolmaker	13
Forklift operator	5		
Material handling		<u>Added</u>	
equipment operator	5		
Truckdriver (medium)	6	Store worker	4
Truckdriver (heavy)	7	Truckdriver	
Machine tool operator II	8	(semitrailer)	8
Machine tool operator I	9	Meat cutter	8
Carpenter	9	Air-conditioning	
Electrician	10	mechanic	10
		Wood craftsman	10

Several additional jobs were also surveyed, some outside the Tidewater area, because of a provision of the wage legislation popularly known as the Monroney Amendment (5 U.S.C. 5343 (d)). The amendment requires that there be a "sufficient" number of private industry positions in an area that are comparable to the principle types of positions for which the survey is made. If there is not a sufficient number the agency is to look to the nearest comparable wage area for additional jobs to survey. The Federal Personnel Manual defines principle types of positions as those which pertain to any of ten specialized industries and employ 1,000 people or 25 percent of the total work force. The Tidewater area qualified for 2 of the 10 specialized industries--aircraft with 3,821 employees and shipbuilding with 7,021. To satisfy the Monroney requirements, the Federal Personnel Manual states that there must be an equal number of specialized jobs in counterpart private industries which yield specified numbers of job matches at various grades. In the Tidewater area private shipbuilding met these criteria, but the aircraft industry did not, therefore it was necessary to look beyond the area for survey data. Philadelphia, Pennsylvania, was the closest area with sufficient aircraft industry and jobs to meet the Monroney criteria. Aircraft industries were included in the survey for the 22 required jobs and 4 aircraft-related jobs.

<u>Job</u>	<u>Grade</u>
Aircraft attendant (ground service)	7
Aircraft structures assembler B	7
Aircraft structures assembler A	9
Aircraft mechanic	10

The following specialized shipbuilding jobs also had to be added to the survey, but they did not have to be surveyed in Philadelphia because the Tidewater area had adequate shipbuilding industry and jobs.

	<u>Grade</u>
Electrician, ship	10
Pipefitter, ship	10
Shipfitter	10
Shipwright	10
Machinist, marine	10

We found no discrepancies in the design and scope of the survey.

Job matching

Job matching is done by data collectors in two-member teams of Federal employees--one nominated by labor and one nominated by the agency. At participating firms the data collectors match jobs with position descriptions of survey jobs and enter the number of these jobs and their wage rates on a standard form. The forms are reviewed and approved by the local committee and again by wage specialists on the DOD technical staff. Enclosure II shows the number of final matches for each survey job inside and outside the Tidewater area, and the weighted average wage for each job.

Philadelphia data was available from an October 1975 wage survey. The Federal Personnel Manual permits this use of data from outside an area as long as the survey is not over a year old and its rates are current. DOD complied by updating the October 1975 rates over the telephone.

The DOD technical staff deleted 49 job matches which were approved by the local committee. These were:

<u>Grade</u>	<u>Job</u>	<u>No. of matches</u>
1	Janitor (light)	6
2	Material handler	11
3	Maintenance laborer	10
5	Material handling equipment operator	1
5	Forklift operator	4
10	Pipefitter	<u>17</u>
	Total	<u>49</u>

The technical staff ruled that these were improper job matches because certain significant duties were different between the Federal and private jobs. The wage rate of the private job was not a criterion for rejecting the matches. Because of the small number involved, there was no material effect on the wage schedule.

Changes in Philadelphia data used
in the 1975 and 1976
Tidewater surveys

The Philadelphia wage data which was used in the 1976 Tidewater survey differed significantly from the data used in 1975 partly because of a change in the coverage of firms. Previously, aircraft industries were selected on a sample basis and the results were projected to arrive at the estimated number of matches in the entire industry. More than 20 percent of the 1975 job matches from Philadelphia were projected estimates while for the 1976 survey, the entire aircraft industry was included with no projection involved. This and changes in survey jobs sometimes had a marked effect. For example, in 1975, Federal grade 2 laborer duties were matched to 70 jobs at \$6.04 an hour. Sample projection increased the 70 jobs to 210 jobs. As a result of a revision to the Federal Personnel Manual, that job was later dropped and replaced by a grade 2 material handler job with different duties. The 1976 survey produced only one material handler at \$3.50 an hour from Philadelphia in contrast to the 210 jobs a year earlier at \$6.04 an hour.

A matching change also had an effect. Prior to 1976, the duties of grade 1 janitors were matched with much higher-paid aircraft cleaners. Then by separate action involving the establishment of a special wage schedule for certain positions in Puerto Rico, aircraft cleaner duties were fully studied and approved by the Civil Service Commission as grade 3 jobs. Thus, in the 1976 Tidewater survey there were no matches comparable to the ones made to grade 1 at \$4.48 an hour in 1975. As shown in Enclosure II the only grade 1 janitor matches in Philadelphia aircraft industries were at \$2.94 an hour.

The overall impact of the Philadelphia data was much less helpful to lower grades in 1976 than it was in 1975. Shown below for both years are the hourly amounts by which the Philadelphia data increased the Tidewater data when the two were combined.

<u>Grade</u>	<u>Increase</u>	
	<u>1975</u>	<u>1976</u>
1	\$.35	\$.03
2	.33	.05
3	.31	.05
4	.29	.06
5	.27	.07
6	.25	.08
7	.23	.08
8	.21	.10
9	.19	.10
10	.17	.11
11	.14	.12
12	.11	.13
13	.0	.13
14	.0	.13
15	.0	.05
Average	.19	.09
Percent increase over Tidewater rates	3.8	1.6

Though the adjustments discussed above had an abnormal one-time effect on the wage schedule, they did not violate wage legislation or survey guidelines.

TREND LINES USED IN MAKING THE FINDING

When average wages for each job are plotted on a graph (horizontal axis for grades, vertical axis for hourly rates), the result is a scatter diagram or array of points generally showing the tendency that higher grades are paid higher wages. Visually, little else can be concluded from a scatter diagram, and it is unlikely that two people would draw exactly the same line through one if both were trying to arrive at a pay line that best fit all the data.

This problem is solved by an accepted mathematical formula which produces a trend line that goes through the exact statistical center of the data. More technically, the sum of the deviations of the data above the line exactly balances the sum of deviations below, and the sum of the squares of all deviations above and below the line is less than for any other straight line. Hence its name, "least squares" method for computing a trend line. Also, because it is a straight line it provides identical pay differentials between grades.

Three trend lines were computed and considered in the Tidewater survey.

1. A unit line which gave equal weight to each of the 33 job averages.
2. A frequency line which weighted each job average by the number of matches found for that job.
3. A midpoint line halfway between the unit and frequency lines.

These three lines are routinely computed for each wage survey. For the Tidewater area (including Philadelphia wages), the raw data produced the following, as compared to the then current pay line and number of employees at each grade.

Grade	Number of nonsupervisory employees in the area	Then current payline	Actual average per the survey--before payline computation	1976 Paylines		
				Frequency	Midpoint	Unit
1	88	\$3.49	\$3.93	\$3.61	\$3.78	\$3.94
2	598	3.73	4.08	3.88	4.04	4.20
3	336	3.97	4.05	4.14	4.30	4.45
4	344	4.21	5.61	4.41	4.56	4.71
5	1,868	4.45	4.46	4.67	4.82	4.96
6	1,047	4.69	4.02	4.94	5.08	5.22
7	682	4.93	4.76	5.20	5.34	5.47
8	1,593	5.17	6.30	5.47	5.60	5.72
9	982	5.41	6.24	5.73	5.86	5.98
10	6,139	5.65	5.99	6.00	6.12	6.23
11	1,042	5.88	6.34	6.26	6.38	6.49
12	598	6.11	(a)	6.53	6.64	6.74
13	240	6.27	7.26	6.79	6.90	7.00
14	37	6.53	(a)	7.06	7.16	7.25
15	16	6.79	(a)	7.32	7.41	7.51
Total						
15,610						
Average rate		\$5.152		\$5.467	\$5.599	\$5.725
Percent increase over then current payline				6.12	8.68	11.12

a/No jobs surveyed at this grade.

Before the above paylines could be considered they had to be modified to conform to another Federal Personnel Manual rule implementing the Monroney amendment. Simply stated, data gathered outside the wage area can only be used to increase inside-the-area rates, and never reduce them. Separate paylines must therefore be calculated with data from the local area. Outside data is then added and combined trend lines (shown on p. 7) are calculated. At each grade the combined rate cannot be lower than the inside rate nor can it be more than the rate paid outside the area. Application of these rules lowered the frequency and midpoint lines slightly and raised the unit line. The results are as follows:

	<u>Paylines</u>		
	<u>Frequency</u>	<u>Midpoint</u>	<u>Unit</u>
Average rate	\$5.459	\$5.591	\$5.742
Percent increase over then current payline	5.96	8.52	11.45

The grade-by-grade effect on each line is shown in Enclosure III.

The Federal Personnel Manual states that three things should be considered when selecting a payline.

1. The desirable objective of a rate schedule providing uniform cents-an-hour pay differentials between successive grades;
2. Relationship to the average wage rates for specific occupations represented in the survey jobs and having substantial Federal employment in an area;
3. Current local labor market conditions in relation to principal occupations used by local installations.

The DOD technical staff felt, and we agree, that the frequency line was the most appropriate one because it was closest to the actual average wages being paid in private sector occupations which matched most of the Federal work force. For example, at grade 10 (nearly 40 percent of the nonsupervisory workforce) the private sector average wage for matched jobs was \$5.99 an hour. The frequency line rate was only a penny different at \$6.00 whereas the midpoint rate was \$6.12 and the unit was \$6.23. The relationship was similar using only inside-the-area data. Overall, the frequency line was the closest to actual averages at grades in which 52 percent of the Federal workforce was employed.

The two management members of the DOD wage committee voted for the frequency line because it best fit the wage data at key grades in which large numbers of workers were employed and in which most of the job matches were made. The two labor members voted for the midpoint line because it offered a higher raise for lower grades. The committee chairman voted with the management members, and the 5.96 percent frequency line was adopted by a three-to-two vote.

While in this case there was a difference of opinion regarding which trend line to use, this does not seem to be a general problem in the proceedings of the wage fixing authority. From July 1975 to the time of our review, the wage committee ruled on 165 interim and final wage increases and labor and management disagreed over the choice of trend line only 9 times.

If wages in the area were up 8 percent,
why was the increase less than 6 percent?

Union officials were concerned why the final increase was less than 6 percent when, as DOD officials stated, calculations for the Tidewater area (or inside data) showed an increase of 8.28 percent over 1975.

The 8.28 figure is factually correct but can be misleading if not completely understood. Wage schedules are based on the increase that occurs in Tidewater data combined with Philadelphia aircraft data--that was 5.96 percent as explained above. Neither 1975 nor 1976 wages were based on inside data only.

It appears that the DOD technical staff was emphasizing the point that if there had never been a Monroney amendment requiring wage data to be brought in from outside, the increase in the Tidewater area would have been 8.28 percent. But, as shown below, that increase refers to a lower wage than actually being paid because Philadelphia aircraft wages tend to be higher than Tidewater wages and they increase the combined payline.

	<u>Average hourly rates</u>		<u>Percent increase</u>
	<u>1975</u>	<u>1976</u>	
Inside data only--what wages would have been if there was no Monroney amendment	\$4.962	\$5.373	8.28
Actual--combined Tidewater and Philadelphia data	5.152	5.459	5.96

A May 1976 survey of Tidewater area wages by the Bureau of Labor Statistics showed that industrial wages increased 8.3 percent for unskilled workers and 7.2 percent for skilled trades.

THE ADEQUACY OF INFORMATION FROM THE
MAJOR PRIVATE ORGANIZATION

Wage data from the firm identified by the local labor representatives dominated the survey. This was both logical and essential because the firm is (1) the largest private employer in the area and (2) a shipyard as is the largest Federal employer. Of 12,500 job matches in the area, 8,977 came from this firm.

Most of the job matches were disputed by the labor member of the local wage survey committee, but he was outvoted by the management member and committee chairman. The differences in the committee centered around the firm's production employees who were classified into four skill categories (specialist, mechanic, handyman, and helper), and how the categories equated to federal journeymen and trades helpers. For the most part this meant wage grades 10 and 5, respectively. The labor member felt that the duties of the firm's specialists matched the job descriptions of journeymen, but the other two committee members felt that both specialists and lower paid mechanics matched the journeyman jobs. At the other end of the scale, the labor member believed that Government trades helpers matched only the firm's handyman category and none of the lower paid helpers. The committee voted 2 to 1 that the firm's helpers equated to Government helpers.

The technical staff project officer reviewed the procedures by which this data was gathered and met with compensation officials of the firm to obtain additional information about the jobs in question. He compared how the firm and the Government placed and promoted their skilled and unskilled workers and concluded that the similarities called for matching helpers with helpers and journeymen with both mechanics and specialists as the local committee had done.

The labor member and his alternate on the local committee then filed a minority report restating their positions and alleging that the private shipyard made the job matches instead of the Government data collectors and had reason to give out erroneous information in order to depress the Government wage raise. Because of the importance of this firm's data to the survey, and the alleged improprieties, the technical staff

felt it was imperative that the local committee's differences be resolved before the staff proposed a wage schedule. A meeting was therefore held attended by officials of the technical staff, the local wage committee, data collectors, and union officials. They established that the firm initially was given the Government job descriptions for information gathering purposes, but the data collectors did the actual job matching. After the meeting the minority report was withdrawn.

We find no serious basis for the charge that data from the private firm was used to depress Government wages. First, the technical staff acknowledged labor's minority views, followed up on them and presented their conclusions. Second, (as explained on p. 10) the wage survey showed nearly the same increase in industrial wages as was independently determined by the Bureau of Labor Statistics wage survey for the area. Third, the resulting Government wage scale is very favorable when compared to the private firm's wages.

APPARENT PREDETERMINATION MADE BY RESPONSIBLE OFFICIALS CONCERNING WHAT THE INCREASE WOULD BE

DOD wage officials strongly deny that they ever pre-determined a wage increase or made any remarks to that effect. They stressed that all members involved in the wage setting process are aware that blue-collar raises are determined by the gathered data and not by budgetary constraints.

We found no evidence to contradict this position, and in fact, the recent history of blue-collar wage raises throughout the country supports it. Since July 1, 1975, the DOD Wage Fixing Authority completed 155 wage schedules. Annual raises averaged 9 percent, and as shown below only 8 raises were less than 6 percent.

<u>Number of wage increases</u>	<u>Percent</u>
1	3.90
7	4.00 to 5.99
45	6.00 to 7.99
60	8.00 to 9.99
32	10.00 to 11.99
5	12.00 to 13.99
3	14.00 to 15.99
<u>2</u>	16.00 to 17.99
Total	<u>155</u>

ABSENCE OF INFORMATION AVAILABLE TO THE
METAL TRADES COUNCIL IN VIEW OF THE
CONFIDENTIALITY OF CERTAIN INFORMATION

Section 10 of the Federal Advisory Committee Act (Public Law 92-463) states that proceedings of executive branch advisory committees (including the DOD Wage Committee) shall be open to the public except when committee meetings concern matters exempted from disclosure under the Freedom of Information Act (5 U.S.C. 552). The latter mentions nine matters that are exempted.

The Department of Defense believes that two of the nine exemptions apply to wage committee proceedings, and therefore the meetings should be closed to the public. These two exemptions are:

1. "Trade secrets and commercial or financial information obtained from a person and privileged or confidential" (subsection (b)(4) of section 552).
2. "Related solely to the internal personnel rules and practices of an agency" (subsection (b)(2) of section 552).

The first exemption pertains to wage data obtained from the private sector. When DOD requests firms to participate it pledges that information will remain confidential and used only for prevailing rate determinations. In the wage committee deliberations, the topic of specific firms' wages and raises often arises. Opening the meetings would violate the confidentiality pledge and make it difficult if not impossible to conduct future surveys. DOD wage officials feel it would be impractical to try to separate matters which disclose information on specific firms from other matters (such as overall averages and trend lines) that do not.

As to the second exemption, they believe that pay determination is related solely to the internal personnel rules and practices of DOD.

FINAL WAGE DATA USED TO COMPUTE THE TREND LINES

Grade	Job	Tidewater data		Philadelphia data		Combined data	
		Job matches	Average rate	Job matches	Average rate	Job matches	Average rate
1	Janitor (light)	115	\$3.948	2	\$2.942	117	\$3.930
2	Janitor	472	3.940	37	5.705	509	4.068
2	Material handler	270	4.104	1	3.502	271	4.101
3	Maintenance laborer	52	4.949	-	-	52	4.949
4	Packer	14	3.784	3	6.677	17	4.294
4	Store worker	314	5.683	-	-	314	5.683
5	Helper (trades)	3,297	4.281	2	3.926	3,299	4.280
5	Warehouseman	375	5.177	142	6.466	517	5.531
5	Forklift operator	411	4.355	-	-	411	4.355
5	Material handling equipment operator	40	6.172	21	6.140	61	6.160
6	Truckdriver (medium)	25	3.916	2	5.343	27	4.021
7	Truckdriver (heavy)	287	4.752	6	6.280	293	4.763
7	Aircraft attendant (ground service)	-	-	-	-	-	(a)
7	Aircraft structures assembler B	-	-	-	-	-	(a)
8	Machine tool operator II	18	3.780	9	3.483	27	3.681
8	Truckdriver (semitrailer)	193	6.094	-	-	193	6.094
8	Meat cutter	150	7.037	-	-	150	7.037
9	Machine tool operator I	64	4.855	82	6.646	146	5.860
9	Carpenter	60	6.276	4	6.770	64	6.306
9	Aircraft structures assembler A	-	-	99	6.770	99	6.770
10	Electrician	235	6.566	35	7.057	270	6.629
10	Automotive mechanic	102	6.364	61	7.852	163	6.920
10	Sheet metal mechanic	792	5.878	14	6.601	716	5.892
10	Pipefitter	111	6.290	-	-	111	6.290
10	Welder	1,367	5.873	19	6.566	1,386	5.882
10	Machinist	705	5.987	76	6.943	781	6.080
10	Aircraft mechanic	18	8.600	243	7.566	261	7.637
10	Electrician, ship	653	5.808	-	-	653	5.808
10	Pipefitter, ship	710	5.792	-	-	710	5.792
10	Shipfitter	986	5.738	-	-	986	5.738
10	Shipwright	57	5.803	-	-	57	5.803
10	Machinist, marine	598	5.729	-	-	598	5.729
10	Air conditioning mechanic	37	6.697	-	-	37	6.697
10	Woodcraftsman	-	-	-	-	-	(a)
11	Electronics mechanic	44	6.058	16	7.116	60	6.340
13	Toolmaker	16	7.700	27	6.968	45	7.260
	Total	<u>12,500</u>		<u>901</u>		<u>13,401</u>	

a/Not enough matches found (minimum of 10 needed) to be included in the wage data.

