November 11, 2019

The Honorable Janet Dhillon
Chair, U.S. Equal Employment Opportunity Commission
131 M Street, NE
Washington, DC 20507

Dear Chair Dhillon:
The Connecticut Women’s Education and Legal Fund (CWEALF) is a statewide, nonprofit organization that advocates for and empowers women and girls in Connecticut, especially those who are underserved or marginalized. For forty-six years, CWEALF has been a leading advocate of policy solutions that enhance women’s economic security and combat discrimination.

CWEALF writes to comment on the Equal Employment Opportunity Commission’s (“EEOC”) September 12, 2019 “Notice of Information Collection – Request For New Control Number For a Currently Approved Collection: Employer Information Report (EEO-1) Component 1; Revision of Existing Approval for EEO-1 Component 2” (“the Notice”). The Notice announces that while EEOC seeks to submit a request for a three-year approval of Component 1 of the EEO-1, it does not intend to request renewal of Component 2, which requires empower to submit data on employees’ W-2 earnings and hours worked by pay band, as well as sex, race, ethnicity, and job category.

CWEALF urges the EEOC to immediately request renewal of Component 2 to ensure continuation of pay data collection from employers now and in the future. Pay inequity is a serious issue that continues to impact women and people of color, despite federal and state laws that prohibit pay discrimination based on race, ethnicity, and gender.

Women in Connecticut earn, on average, 83 cents for every dollar a man earns, a disparity more severe for women of color. For example, Black women earn 57 cents, Latina women earn 47 cents, and Asian women are paid 80 cents for dollar earned by white men. On average, women lose an estimated $5.5 billion to the wage gap. Overall, women lose $403,440 over the course of a 40-year career because of the gender wage gap. These numbers continue to increase for women of color: Latinas may lose an estimated $1,056,120, while Black women may lose $867,920. Elimination of the wage gap is critical to boost families out of poverty and will benefit the larger economy: research shows that if women were to receive equal pay, the United States would produce an estimated $512.6 billion in additional income.

EEO-1 Component 2 data provides the EEOC with information to identify trends in pay disparities and address future enforcement efforts. This can only be done if Component 2 data is complete and

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1 National Women’s Law Center. Retrieved from https://nwlc.org/state/connecticut/
thorough. The EEOC’s conclusion that the utility of Component 2 pay data is outweighed by burden to employers is questionable and unsupported by information in the Notice.

CWEALF strongly supports the collection of pay data from employers and urges the EEOC to request a renewal of Component 2 of the EEO-1, which is critical to evaluate progress on closing the pay gap, ensure proper enforcement of civil rights laws, and identify patterns and trends that could help shape proactive measures to prevent pay discrimination.

Sincerely,

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