

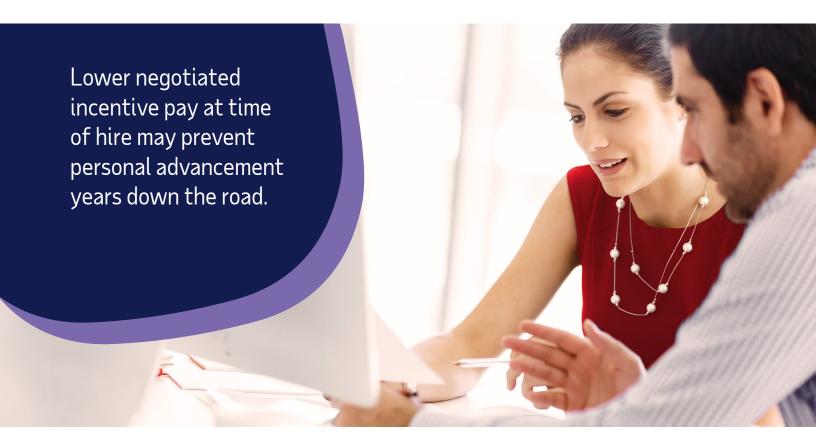


Rethinking Gender Pay Inequity in a More Transparent World.

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Executive Summary

The ADP Research Institute® (ADP RI) conducted a study of gender pay inequity to determine the relative contributions of recruiting, base pay, and incentive pay to an overall gender pay disparity across the U.S. workforce. The study took an anonymous sample of men and women — newly hired into exempt salaried positions, in the 3rd Quarter of 2010 — and tracked their base pay, incentive pay, and average total income through December 2016. The study examined disparities in base pay and incentive pay between genders both at time of hire and after six years of tenure within the same organization.

Some of the most significant findings are:

- 1. A larger proportion of women begin their career at a lower wage compared to men.
- 2. An explicit disparity exists in incentive pay between male and female employees at moment of hire. For employees with bonus, females start with base salary gap of 82%, which deteriorates to 81% because of the disparity in incentive pay which is where the gap is 69%.
- 3. Younger women fared the worst in incentive pay with a bonus to base ratio of 79% that of male counterpart which widened the gap in total earnings.
- 4. The total earnings gap for women between ages 40-50 widened compared to base salary at the lower and higher end of the income spectrum because of the wider gap in bonus to base ratio 74% and 82% correspondingly.
- 5. Gap in incentive pay in favor of women in the Information industry at 107% helped to improve the gap in total earnings at 89% from gap in starting base salary at 87%.
- 6. Considering all exempt employees who received bonuses during the six years under study, the differences in average annual base, bonus, and total earnings between genders are all statistically significant and also across industries.
- 7. The average bonus amount for women was less than two-thirds of the amount paid to men who had equivalent base pay, age, and tenure. This incentive pay disparity was observed across all age, salary, and industry groups from the moment of hire and persisted throughout the six-year study window.

The authors of the study suggest that lower incentive pay may create a hidden bias against the promotion of qualified women versus their more highly compensated male peers, because the promotion might reveal a substantial disparity in total compensation occurring over a period of several years. In other words, lower negotiated incentive pay at time of hire may become a limiting factor that prevents career advancement years down the road.

Introduction

When are differences in pay justified? Modern employers face this question every day — and there are no easy answers. While the United States enshrined the concept of equal pay for equal work with the passage of the Fair Labor Standards Act of 1938, today many questions remain, such as:

- What constitutes "equivalent" work?
- How do you define "equal pay" when employees work in different locations and have different work experiences?
- Does equal pay apply to workers who are contractors and employees?
- What circumstances, if any, justify the unequal distribution of hires and promotions between genders?
- Does the definition of "equal pay" include just base pay, or also incentive pay, benefits, and imputed income?
- Is there a statute of limitation for unfair treatment of employees?

As employment practices in the United States have evolved, so has federal and state legislation. Starting with the Equal Pay Act of 1963 and Title VII of the Civil Rights Act of 1964, the U.S. Congress has passed at least nine major bills addressing discrimination to help ensure the legal protections for pay equity are enforced across various protected categories, such as race, religion, ethnicity, disability, age, and national origin. More recently, Congress passed the Lilly Ledbetter Fair Pay Act of 2009, which amends the 180-day statute for filing an equal-pay lawsuit to reset with each new paycheck impacted by the original act of discrimination.

States have added their own guidelines. The California Fair Pay Act, for example, looks past job classification to examine the situation of employees who perform "substantially similar work," and forbids retaliation against workers who share their personal compensation information with co-workers. Multiple states explicitly focus on total compensation rather than only base pay. Some states and local jurisdictions, such as Massachusetts and New York City, are advancing ordinances that forbid an employer to request the salary history of a prospective employee for purposes of negotiating salaries.

Across all industries, women earn 83% of what men earn.

across lines of gender. Women in the United States constitute 47 percent of the total U.S. workforce, 50 percent of college graduates, and 50 percent of all professional and post-doctoral degrees, according to the 2016 Current Population Survey from Bureau of Labor Statistics. However, they collectively earn only 83 percent of what men earn. Lower levels of pay for women appear universally, regardless of education, experience, industry, and profession. This is despite significant publicity, increasingly strict enforcement by federal and state regulators, and the good intentions of employers who view diversity and inclusion as both an opportunity to develop competitive advantage and, purely, as the right thing to do.

Yet, pay inequity persists across many protected classes — most predominantly

What Drives Pay Disparity?

The causes of fundamental pay disparity between males and females are complex and diverse. The value proposition of employment is driven by a variety of tangible and intangible factors. Salary represents only one component. There are many intangible rewards that may make one position or employer preferable to another, including work content, culture, flexibility of hours and commute distance, to name just a few. Male and female employees alike will make employment choices that may seem irrational if viewed from the perspective of salary alone, but are perfectly rational in the broader context of total rewards.

Tangible & Intangible Employment Factors							
Employment Factors	Short Term	Long Term					
Tangible	Base Pay / OvertimeBonus / IncentivesHealth / Disability Benefits	Stock PlansShare Options401(k) / Pension / Vesting					
Intangible	 Flexible Work Arrangements Employment Policies Work / Life Balance: Commute, Dependent Care, etc. 	 Organization Mission / Culture Work Content / Career Development Supervisor Behavior Trust in Senior Management 					

Moreover, employer pay programs themselves may reflect cultural norms and values that are preferred by one gender over another; the availability and criticality of specific skills; the socio-demographic make-up of the communities from where labor originates; or the communities that labor serves. There also may be socio-demographic factors impacting women that lead them to approach careers differently than men and affect their total average earnings.

As a result, while pay discrimination due to gender is explicitly prohibited by federal law, hiring, promotion and pay practices may be tied to other factors not necessarily addressed explicitly by law.

The diagram, below, shows several of these factors, each of which contributes to the **overall 27%** pay disparity observed between men and women employees in the United States. Pay inequality results from multiple independent causes.

Factors Driving Pay Inequality Performance Promotion Recruitment Opportunities Review Incentive Industry Pav Socio-Career Age / Demographic Education Path Job Role **Tenure Factors** Level Definition

While we have anecdotal insight into some causes of pay disparity, it remains challenging to determine which issues an employer should address first to create a diverse and inclusive work environment. To what extent are differences in pay dependent upon job position versus negotiated salary and incentive pay? To what extent is there evidence that socio-demographic factors, such as maternal leave or caregiving, are affecting career choices? Isolating each causative factor and quantifying its importance is difficult.

To help answer these questions, ADP RI has conducted new research to help isolate some of these factors. ADP° datasets allow us to track base pay and incentive pay from initial date of hire through a fixed period of time. By taking an anonymized snapshot of those hired during the 3rd Quarter of 2010 — and tracking their salary and incentive history through the end of 2016 — we have insights into the recruitment, promotion, and tenure profiles for a large sample of men and women across multiple industries. By further dividing our data by age and income at time of hire, we also have a proxy for comparing men and women who have comparable education and professional experience. While we cannot identify specific promotions, the salary history of each sample captures the impact of any promotion that may have occurred.

That said, the study does have some limitations. Other information — including position descriptions, sociodemographic factors, and performance rankings — cannot be easily inferred from the data.

Focus on Incentive Pay and Total Compensation

A key focus of this study is incentive pay, which is a monetary gift provided to an employee based on performance, and is one way to entice the employee to continue delivering positive results. Why would differences in incentive compensation matter so significantly? For starters, incentive compensation is often negotiated separately from salary and may be subject to greater hiring manager discretion and less oversight. Compounding the problem, supervisors are often asked to allocate merit increases and incentive awards simultaneously to their staff, while working with different rules and constraints. For example, a manager may choose to award higher merit pay to an individual with a lower starting salary, and may try to even out the distribution of pay by awarding higher incentive pay to individuals where a salary increase has been capped. As a result, the impact of disparities in incentive pay may accumulate substantially as employees move to positions of greater responsibility within the organization. Potentially, this can create an unexpectedly large gap in total earnings over time.

Unfortunately, many employers focus their internal studies of gender pay equity on base salary alone, because base salary can be easily captured from an HR system of record. As a practical matter, many older compensation and talent management systems interface with the HR system of record, but may not have easy access to payroll records that are needed to analyze actual bonus amounts and total annual compensation. As a result, employers are often not aware of gender pay disparities that may arise from incentive pay practices.

Ultimately, federal and state regulators focus on total actual compensation, as well as each individual component of pay, to determine evidence of gender bias in pay practices. In a court of law, total employer liability for unfair pay practices is typically based on evidence from payroll records that show actual total compensation paid out for the time period in question.

Data & Methodology

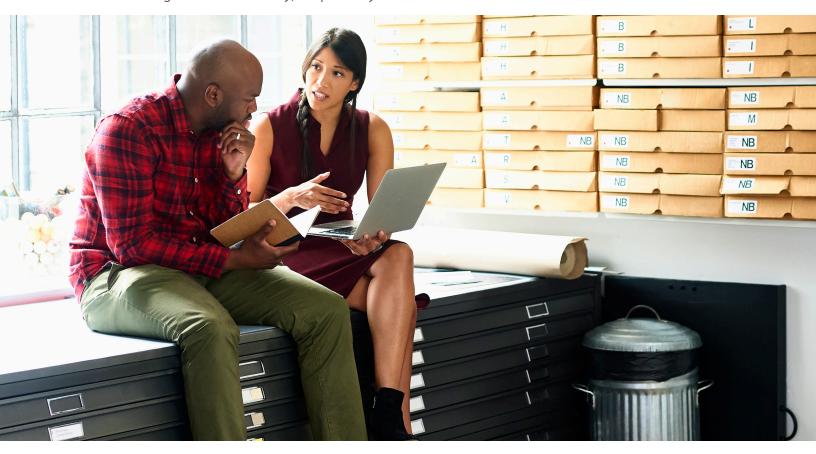
Anonymized aggregated payroll data for newly hired, salaried employees from July, August, and September of 2010 were considered for the analysis, since it was assumed that only salaried employees were receiving incentive pay. Initial sample size was approximately 123,000 employees. These newly hired workers, who had continuously worked for every month for the same company, were tracked through December of 2016. The resulting sample size was approximately 11,000.

The base salary is based on employees' salary in the first year. Bonus amount was identified after adjusting gross pay for incidentals (reimbursement of expenses, etc.).

In order to provide statistical significance for the gender pay gap, T-tests were performed for starting salary, average base salary, average total earnings, and average annual bonus, for each of the 17 groups as well as the entire national population. Further, the same T-tests were applied to all the groups for different industry combinations, namely Wholesale and Retail Trade, Financial Activities, Professional and Business Services, Manufacturing, Information, and Education and Health Services.

For each T-test, the equality of variance between the male and female was also tested initially using the F-test, first. If the variance of a particular variable was found to be significantly different, statistically, between the two groups, the Statterthwaite method was used; otherwise, the Pooled Variance Method was used.

The T-tests were performed at 95 percent and 99 percent confidence levels. When the gap between males and females was found to be statistically significant at 99 percent and 95 percent confidence levels, the gap was indicated as "Significant" and "Likely," respectively.



RESULTS →

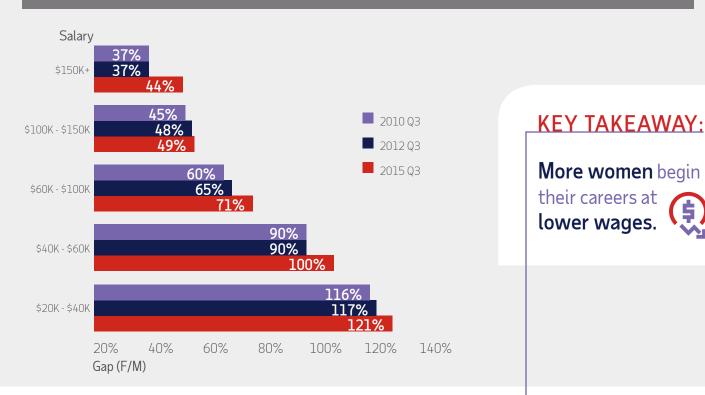
Distribution Changes in New Hires

There is a consistent pattern in initial salary distribution for males and females — a disproportionately higher number of women were hired at lower pay. For base pay below \$40K, the difference in distribution between genders is 20-30 percent higher for women; for base pay above \$100K it is 50-60 percent lower.

From an age perspective, again, there are proportionally more younger-age females than men, but this gap seems to be shrinking over time. It was 31 percent higher for the 20-30 age group for 2010 new hires, but dropped to 21 percent in 2015. In the older age groups, the difference points in the opposite direction. The gap between the distributions of genders was about 18-20 percent lower for the females.

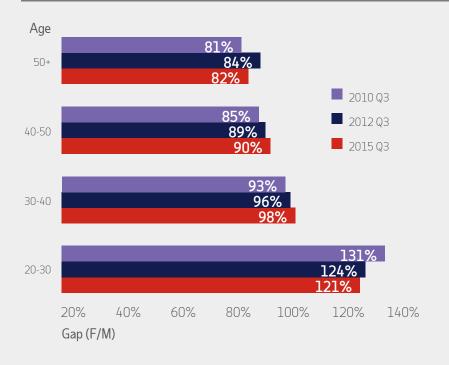
This points to an unavoidable fact: the average pay gap would continue for the foreseeable future, as long as there remained a disproportionate concentration of women at lower wage levels.

New Hires: Gender Differences by Salary at Hire





New Hires: Gender Differences by Age



Refer to Appendix page 20 for full information.

KEY TAKEAWAY:

The proportion of newly hired women is highest between the ages of 20 and 30.

Do Gender Differences Impact Incentive Pay – Specifically Bonuses?

Considering all the new hires from the 3rd Quarter of 2010 who stayed with the same job until 2016, women were hired at a base salary which was only 82 percent of that of men. Though the annual average growth in base was marginally higher for women, it was inconsequential in closing the gap in base salary after six years. Women fared even worse in the incentive pay arena since the average bonus-to-base percentage was only 83 percent when compared to men. In fact, average earnings for women over six years was worse than what they started with — going from 82 percent of men's starting base to 81 percent of average total earnings of men.

It seems once an employee starts with a lower salary, it becomes an insurmountable obstacle to cross.

KEY TAKEAWAY:

Females receive 81% of average total earnings of men.



These lower salary employees may even be overlooked for promotion, when compared with a higher-paid employee of the same caliber.

Gender Differences for All Ages and All Starting Salaries

		All Employees		Employees With Bonus			
	Female	Male	Gap (F/M)	Female	Male	Gap (F/M)	
Average Salary When Hired	\$61,542	\$75,096	82%	\$61,522	\$75,162	82%	
Average Ending Base Salary	\$82,789	\$99,233	83%	\$82,287	\$98,350	84%	
Average Annual Base	\$72,311	\$87,447	83%	\$71,899	\$86,755	83%	
Average Annual Growth in Base (%)	5.9%	5.5%	0%	5.8%	5.3%	0%	
Average 2011 Bonus	\$4,303	\$6,285	68%	\$5,091	\$7,388	69%	
Average Annual Bonus Thru 2016	\$6,920	\$10,075	69%	\$8,187	\$11,843	69%	
Average (Bonus/Base) (%)	9.4%	11.4%	83%	11.2%	13.5%	83%	
Average Annual Total Earnings	\$79,231	\$97,522	81%	\$80,085	\$98,598	81%	
Employees With Bonus (%)	85%	85%	-1%	100%	100%	0	

Is This Trend Evident in Different Groups of Workers?

New hires were categorized by age and income to identify if there were substantial differences between different groups.

For younger women with a low starting salary, the genders started at par, but then the base salary gap worsened for these women after six years. Though all the age groups started with the same average starting salary, the young group garnered the highest growth rate in their base. Older women achieved better base growth than their counterparts, which helped them to maintain the same salary gap they started with.

On the other hand, while their situation improved with age, young women didn't do as well regarding incentive pay as compared to men. The difference between the genders on an average bonus-to-base ratio for younger workers was 79 percent compared to matured workers for whom it was 92 percent.

Though the young women started with 99 percent starting base salary of men, they ended up with 95 percent of the average total earnings of men.

KEY TAKEAWAY:

Younger women fared the worst in incentive pay with a bonus to base ratio of 79% of their male counterparts, widening the gap in total earnings.

Gender Differences by Starting Salary

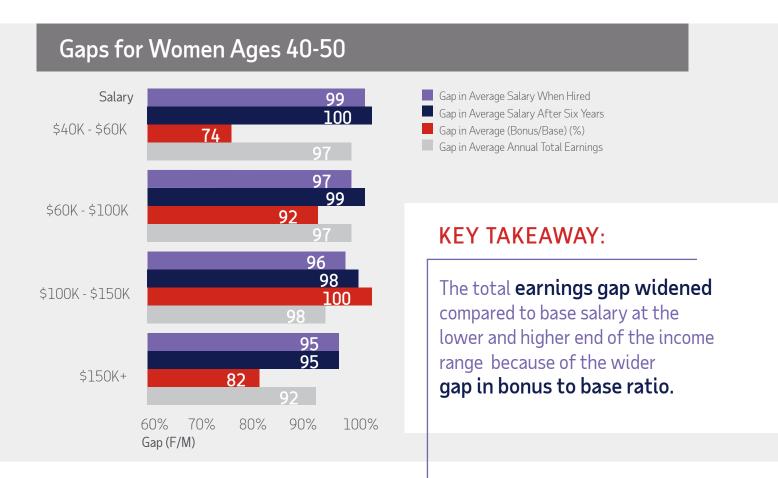
	Age 20 - 30			Age 30 - 40			Age 40 - 50		
	Female	Male	Gap (F/M)	Female	Male	Gap (F/M)	Female	Male	Gap (F/M)
Average Salary When Hired	\$33,328	\$33,729	99%	\$33,099	\$34,384	96%	\$32,721	\$34,467	95%
Average Ending Base Salary	\$54,252	\$56,779	96%	\$46,798	\$48,314	97%	\$44,619	\$46,000	97%
Average Annual Base	\$43,943	\$45,173	97%	\$40,066	\$41,581	96%	\$38,992	\$40,965	95%
Average Annual Growth in Base (%)	9.7%	10.5%	-1%	6.9%	6.8%	0%	6.1%	5.5%	1%
Average 2011 Bonus	\$2,558	\$2,985	86%	\$2,292	\$2,799	82%	\$2,596	\$3,023	86%
Average Annual Bonus Thru 2016	\$4,240	\$5,539	77%	\$3,758	\$4,149	91%	\$3,636	\$4,151	88%
Average (Bonus/Base) (%)	9.4%	11.9%	79%	9.2%	9.8%	93%	9.2%	10.1%	92%
Average Annual Total Earnings	\$48,184	\$50,712	95%	\$43,824	\$45,730	96%	\$42,628	\$45,116	94%
Employees With Bonus (%)	85%	86%	-1%	86%	82%	4%	79%	75%	4%

Middle-Aged Women And Incentive Pay

For the 40-50 age group, men and women started almost with no base salary gap for all income groups and women did well keeping up with men in base salary growth for the next six years. In most groups, they closed the starting gap. The disparity is with incentive pay — especially at the lower-income group. In the \$40K-\$60K income range, the females received an average bonus of 8.5 percent whereas men received 11.4 percent — a gap of 74 percent. Consequently, this dragged their average total earnings down, and the gap in base salary went from 99 percent to 97 percent.

The \$100K-\$150K grouping was best for women where incentive pay was shoulder to shoulder with that of men, though women started with slightly lower pay than men. This eventually boosted their average total earnings and, after six years, the gap was reduced by 2 percent from their starting salaries.

So, it is obvious that not only do women have to start with little or virtually no salary gap, but have to keep up with incentive pay as well, to not to end up behind men in total earnings. In most scenarios, irrespective of age or income groupings, the disparity is greatest in incentive pay. This may be due to a lack of negotiating skills, social or domestic issues, etc., on the part of women.



Do Women Leave Their Jobs More Frequently?

The ADP RI study revealed something very important about men and women and new-hire attrition. From time to time, pundits have suggested that women are paid less than men, presumably because they are more likely to leave work to serve as the primary caregivers to children. Across our entire data sample, however, we saw

minimal evidence that women were more likely than men across any age group to quit work.

After six years, only 11 percent of both men and women who were hired into exempt positions were still with their same employers — an overall average attrition rate of 15 percent annually. Clearly, differences in quit rates by gender are not an explanation for why men are more likely to be hired into higher-paying roles. In fact, a better predictor of attrition was not gender, but age. For the younger age group, females are more likely to quit than males. This trend is reversed for the older age group — at 50+, women have a greater likelihood of staying with the same job at a rate which is 32 percent higher than their counterparts.

KEY TAKEAWAY:

A better predictor of employee turnover is age, not gender.



BEING FAIR AND INCLUSIVE

There is a larger truth behind diversity and inclusion, and pay equity initiatives. Fair pay practices are not merely an important "corporate value," or a tool for managing compliance risk. Rather, fair pay practices are also a core strategy for creating a vibrant, high-performing workforce.

Actions speak louder than words. The fair-and-inclusive employer uses consistent, transparent, and actionable pay practices every day. This includes the small details around determining and communicating individual pay decisions, as well as hands-on training to supervisors and hiring managers to ensure they manage disciplined, objective pay practices. These practices might include:



Enlarging the talent pool available to serve more diverse markets

Supporting better personal and team efforts Promoting objective and collectively accepted standards for performance

Making better hiring and leadership decisions

Conversely, what happens when an employer tolerates significant bias in the way that incentive pay is awarded? Aside from the legal risk, this most likely is an employer who arguably:

- Can't objectively identify and reward its best contributors
- May not be using incentive pay to align individual and team performance
- Has a sub-optimal return on investment for incentive pay

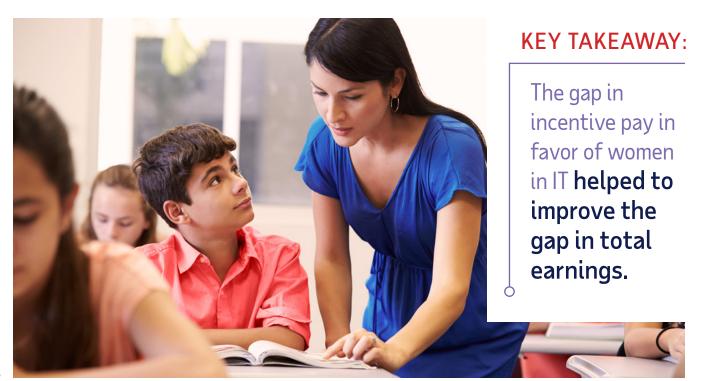
Who would want to work for or invest in such an organization?



Highlights by Industry

The gap in hiring salary was more pronounced in Finance and Real Estate than the other industries considered here. Except for Trade, Transportation and Utility, industries' incentive pay gap was better than starting pay, which helped to maintain or improve the gap from starting salary. In the Information industry, the total earnings gap improved from a starting salary gap. Most of it was due to an incentive pay gap in favor of women.

Gaps for Women by Industry Gap in Average Salary When Hired Gap in Average (Bonus/Base) (%) Gap in Ending Base Salary Gap in Average Annual Total Earnings 107% 89% Finance & Real Estate Information Professional & **Business Services** 88% 97% 86% Manufacturing Education & Health Trade, Transportation & Utility



Are the Differences in Incentive Pay Significant?

Considering all salaried employees who received bonuses during the six years under study, the differences in average annual base, bonus, and total earnings between genders are all statistically significant. That is also true across industries.

However, in some of the individual groupings shown here — there are no significant differences in annual base pay between men and women excluding or barring manufacturing. The differences in annual bonuses, on the other hand, are significant.

Significance Test

- ✓ the female-male difference is statistically significant at 95% confidence level.
- the female-male difference is statistically significant at 90% confidence level.
- X the female-male difference is NOT statistically significant.



ACTIONS EMPLOYERS CAN TAKE

Arguably, unequal incentive pay is an issue that employers should address right away, if for no other reason than to avoid the risk of legal problems or negative publicity. Key actions that an employer might take could include:



Conducting a comprehensive pay equity review that encompasses base pay, incentive pay, and total compensation

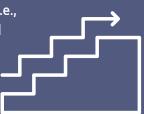


Reviewing recruiting practices and guidelines



provided to hiring managers to negotiate salary and incentives for new hires Examining promotion decisions

for evidence of "pay bias," i.e., awarding promotions based upon salary history rather than performance and fit with position



Creating an HR technology ecosystem

that supports monitoring and analysis of all aspects of compensation on an ongoing basis



Improving communications practices to help ensure that

employees and supervisors have a clear understanding of fair pay practices.



Conclusion

It is clear that a higher percentage of women are hired into starting jobs with lower salary bands, whether by personal choice, social or cultural circumstance, or other reasons. ADP RI's study clearly shows that the proportion of women declines precipitously for positions in higher salary bands.

Disparities in pay observed between comparable peer groups are far more likely to represent some form of systemic gender bias in the workplace that may occur due to recruitment, promotion, performance review, or pay practices. It is these disparities that are most actionable in the short term by an employer and where there is a higher likelihood of compliance risk.

Small gaps widen into significant shortfalls

A gap in incentive pay that occurs at the moment of hire may represent only a small fraction of total income in the first year. Over time, however, the incentive pay gap persists and may create a significant shortfall in total average earnings over five-to-ten years. In the ADP RI study, the incentive pay gap — across virtually all industries — appeared to contribute as much as five percent of the differences in total compensation paid between men and women.

Undoubtedly, a lower starting incentive plan at the point of hire may present troubling career consequences later on. As men and women establish proficiency in their current roles, the lower incentive pay assigned to a female may create a natural barrier to promotion, while higher incentive pay may confer a natural advantage to the male co-worker. How might this happen? Higher incentive pay may create the unwarranted presumption that one employee has better skills.

However, the promotion of the underpaid candidate may bring unwanted visibility to systemically unfair pay practices that may have occurred over several years. It's a natural question to ask, "If I am the better candidate for promotion, why has my co-worker received larger bonuses than me for the past five years?" For some employers, the best way to avoid this uncomfortable question is simply to promote the employee with higher incentive compensation. ADP RI research clearly shows that in most cases, that employee will be male.

As men and women establish proficiency in their current roles, the lower incentive pay assigned to a female may create a natural barrier to promotion, while higher incentive pay may confer a natural advantage to the male co-worker.

Appendix

New Hires: Gender Differences by Salary at Hire

SALARY	2010 Q3 New Hire		2012 Q3 New Hire		2015 Q3 New Hire		Gap (F/M)		
AT HIRE	Female	Male	Female	Male	Female	Male	2010	2012	2015
< \$20K	34%	25%	30%	22%	23%	17%	132%	137%	136%
\$20K-\$40K	37%	32%	37%	32%	37%	31%	116%	117%	121%
\$40K-\$60K	16%	18%	17%	18%	19%	19%	90%	90%	100%
\$60K-\$100K	10%	16%	11%	17%	14%	20%	60%	65%	71%
\$100K-\$150K	3%	6%	3%	7%	5%	9%	45%	48%	49%
\$150K+	1%	3%	1%	3%	2%	4%	37%	37%	44%

New Hires: Gender Differences by Age

AGE	2010 Q3 New Hire		2012 Q3 New Hire		2015 Q3 New Hire		Gap (F/M)		
AGL	Female	Male	Female	Male	Female	Male	2010	2012	2015
< 20	0.4%	0.5%	0.3%	0.4%	0.2%	0.2%	88%	88%	101%
20-30	37%	28%	36%	29%	36%	30%	131%	124%	121%
30-40	28%	30%	28%	30%	29%	30%	93%	96%	98%
40-50	20%	24%	21%	23%	20%	22%	85%	89%	90%
50+	14%	18%	15%	18%	15%	18%	81%	84%	82%

Proportion Stayed with the Same Job – Income Group

	All	Female	Male
<\$20K	3%	3%	4%
\$20-\$40K	3%	4%	3%
\$40-\$60K	15%	17%	14%
\$60-\$100K	19%	22%	18%
\$100-\$150K	22%	20%	23%
\$150K+	12%	12%	12%
ALL	9%	8%	9%
All excluding <\$20K	11%	11%	11%

Proportion Stayed with the Same Job – Age Group

	All	Female	Male
20-30	9%	8%	10%
30-40	12%	12%	12%
40-50	13%	14%	12%
50+	19%	25%	17%

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