



Comparison of DOL OES Wage Guidelines and CUPA-HR Survey Procedures

DOL OES Wage Guidelines ¹	CUPA-HR Survey Procedure
<p>(1) The survey must be recent. If the employer submits a published survey, that survey must have been published within 24 months of the date of submission of the prevailing wage request; be the most current edition of the survey; and be based on data collected within 24 months of the date of the publication of the survey.</p>	<p>CUPA-HR salary surveys for higher education administrators, professionals, and faculty are conducted annually. Salary data are published annually in February. CUPA-HR makes available regional comparison groups to accommodate the prevailing wage determination process. These groups can be tailored to meet case-specific needs for determining any prevailing wage.</p>
<p>(2) The wage data submitted by the employer must reflect the area of intended employment. Area of intended employment means the area within normal commuting distance of the place (address) of intended employment. If the place of intended employment is within a Metropolitan Statistical Area (MSA) or Primary Metropolitan Statistical Area (PMSA), any place within the MSA or PMSA is deemed to be within the normal commuting distance of the place of intended employment.</p>	<p>CUPA-HR salary surveys include institutional information that can be used to create institutional groupings based on MSA, PMSA, or Census Region. Salary figures provided are weighted and unweighted averages and medians.</p>
<p>(3) The job description applicable to wage data submitted by the employer must be adequate to determine that the data represents workers who are similarly employed. Similarly employed means jobs requiring substantially similar levels of skills.</p>	<p>All CUPA-HR salary surveys include job titles and descriptions. These were developed in collaboration with the higher education community and/or on the basis of established job descriptions, such as the Classification of Instructional Programs (CIP) codes developed by the Department of Education. In most cases, positions at individual higher education institutions will be comparable in their content to the CUPA-HR descriptions. To ensure the inclusion in our surveys of faculty working in the medical and allied fields, survey respondents are directed to equate clinical duties with those of teaching and research. Faculty positions in these fields will normally encompass clinical duties.</p>
<p>(4) The wage data must have been collected across industries that employ workers in the occupation.</p>	<p>The American Competitiveness and Workforce Improvement Act (contained in P. L. 105-277) permits the surveying agency, in the case of higher education institutions, related or affiliated nonprofit entities, and nonprofit or governmental research organizations, to take into consideration in the prevailing wage process only those wages paid at these types of institutions and organizations in the area of intended employment. CUPA-HR survey data used for DOL OES Wage Guidelines excludes for-profit institutions.</p>

¹ Employment and Training Administration Prevailing Wage Determination Policy Guidance Nonagricultural Immigration Programs Revised November, 2009

(5) The job description applicable to the employer's survey or other wage data must be an adequate match with the job description contained in the employer's request for acceptance to use the survey or other wage data for prevailing wage purposes. Published wage surveys may not always present an arithmetic mean for job opportunities requiring skills at a level I and level II. In such instances, the arithmetic mean contained in the published survey that most closely conforms to the employer's job opportunity should be used as the basis for the prevailing wage determination. The job description submitted on the request for acceptance of an employer-provided survey or other wage data will be used in determining the appropriate level of skill to be applied.

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Salary data are collected for 202 positions in the Administrators in Higher Education Survey and 396 positions in the Professionals in Higher Education Survey. The Faculty in Higher Education Survey collects salary data, by rank, for 456 disciplines as defined by the *Classification of Instructional Programs: 2010 Edition* published by the U.S. Department of Education's National Center for Education Statistics (NCES). Faculty ranks include full, associate, and assistant professor, as well as instructor. Data for new assistant professors are also collected.

- **Instructor:** An Instructor normally holds a minimum of a master's degree or equivalent, has completed most or all the requirements for the doctorate or equivalent, and is expected to demonstrate effectiveness primarily as a teacher.
- **Assistant Professor:** Generally, an assistant professor has been awarded a doctoral or professional degree or equivalent, exhibits commitment to teaching and scholarly or professional work of high caliber, and participates in college or university affairs at least at the department level.
- **Associate Professor:** Generally, an associate professor meets the requirements for appointment as an assistant professor, enjoys a national reputation as a scholar or professional, shows a high degree of teaching proficiency and commitment, and demonstrates public, professional, or college/university service beyond the department.
- **Professor:** Generally, a professor meets the requirements for appointment as an associate professor, and, in addition, has a distinguished record of accomplishment that leads to an international or, as appropriate, national reputation in his or her field.

<p>(6) The prevailing wage determination should be based on the arithmetic mean (weighted average) of wages for workers that are similarly employed in the area of intended employment. If the survey provides a median wage of workers similarly employed in the area of intended employment and does not provide an arithmetic mean, the median wage shall be used as the basis for making a prevailing wage determination.</p>	<p>CUPA-HR calculates weighted averages (means) based on MSA or an extended geographical area, such as a state or Census Region. The weighted salary methodology is as follows: Weighted averages are calculated on all reported incumbents in all institutions in a comparison group. Each incumbent is given a weight of 1; for instance, an institution reporting 4 incumbents carries more weight in the calculated average than an institution reporting 1 incumbent. If no weighted average can be generated due to unbalanced data, CUPA-HR surveys also report the median salary.</p>
<p>(7) In all cases where an employer provides the NPWHC (National Prevailing Wage and Helpdesk Center) with wage data for which it seeks acceptance, the employer must include the methodology used for the survey to show that it is reasonable and consistent with recognized statistical standards and principles in producing a prevailing wage (e.g., contains a representative sample), including its adherence to these standards for the acceptability of employer-provided wage data. It is important to note that a prevailing wage determination based upon the acceptance of employer-provided wage data for the specific job opportunity at issue does not supersede the OES wage rate for subsequent requests for prevailing wage data in that occupation.</p>	<p>CUPA-HR is a nationally recognized, independent, authoritative source for salaries of administrators, professionals, and faculty in higher education. We have conducted staff salary surveys for 50+ years and faculty salary surveys for 30+ years. The survey methodology employed by CUPA-HR is reasonable and consistent with recognized statistical standards and principles in salary survey research.</p> <p>CUPA-HR surveys higher education institutions—colleges, universities, and system administrative offices. With a few exceptions, the entire population of higher education institutions is surveyed. Response rates are generally over 60 percent. Salaries for each full-time employee by position/discipline are collected and reported in aggregate form. Salaries reflect personnel records at each institution and are generally provided by designated HR staff.</p> <p>All CUPA-HR surveys include job titles and descriptions. Data are collected from respondents using Web-based surveys. To limit response and entry errors, all surveys are reviewed, edited, and screened for data outliers through real-time and server-side validations, as well as by using visual inspection and computer-generated reports. CUPA-HR research staff contact respondents whose data are internally inconsistent or appear to result from the misinterpretation of definitions or other instructions.</p> <p>Survey results from the current academic year are published each February in DataOnDemand, as well as in various reports throughout the year. The publications include descriptions of the responding institutions' characteristics and the research methodology. More detail on this schedule and survey methodology can be found at www.cupahr.org.</p>