



# The Phyllis Schlafly Report

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## Comparable Worth: Unfair to Men and Women

*Testimony by Phyllis Schlafly  
To The Compensation & Employee Benefits Subcommittee  
Of The House Post Office and Civil Service Committee  
May 30, 1985*

My name is Phyllis Schlafly, president of Eagle Forum, a national pro-family organization. I am a lawyer, writer, and homemaker.

We oppose the concept called "Comparable Worth" for two principal reasons: (a) it's unfair to men and (b) it's unfair to women.

The Comparable Worth advocates are trying to freeze the wages of blue-collar men while forcing employers to raise the wages of *some* white- and pink-collar women above marketplace rates. According to the Comparable Worth rationale, blue-collar men are overpaid and their wages should be frozen until white- and pink-collar women have their wages artificially raised to the same level. The proof that this is really what the Comparable Worth debate is all about is in both their rhetoric and their statistics.

I've been debating feminists and listening to their arguments for more than a decade. It is impossible to overlook their rhetoric of envy. I've heard feminist leaders say hundreds of times, "It isn't fair that the man with a high school education earns more money than the woman who graduated from college or nursing or secretarial school."

That complaint means that the feminists believe that truck drivers, electricians, plumbers, mechanics, highway workers, maintenance men, policemen, and firemen earn more money than feminists think they are worth. And how do the feminists judge "worth"? By paper credentials instead of by apprenticeship and hard work, and by ignoring physical risk and unpleasant working conditions.

So the feminists have devised the slogan "Comparable Worth" to make the blue-collar man feel guilty for earning more money than women with paper credentials, and to trick him into accepting a government-enforced wage freeze while all available funds are used to raise the wages of *some* women.

Statistical proof that the aim of Comparable

Worth is to reduce the relative earning power of blue-collar men is abundantly available in the job evaluations commissioned and approved by the Comparable Worth advocates. You can prove this to yourself by making a job-by-job examination of *any* study or evaluation made with the approval of Comparable Worth advocates; it is always an elaborate scheme to devalue the blue-collar man.

For example, look at the Willis evaluation used in the famous case called *AFSCME v. State of Washington*. Willis determined that the electricians and truck drivers were overvalued by the state and that their "worth" was really far less than the "worth" of a registered nurse. More precisely, Willis produced an evaluation chart on which the registered nurse was worth 573 points, whereas the electrician was worth only 193 points (one-third of the nurse), while the truck driver was worth only 97 points (one-sixth of the nurse).

The Federal court accepted the Willis evaluation as though it were some kind of divine law (refusing to listen to the Richard Jeanneret "PAQ" evaluation which produced very different estimates of "worth"). The Federal court decision (unless it is overturned on appeal) means that the electricians and the truck drivers will probably have their wages frozen until the state finds a way to pay the registered nurse three times and six times as much, respectively.

How do jobs get certain points? The evaluator invents them, that's how. The Comparable Worth advocates hire an evaluator under a contract in which he is obligated (a) to ignore all marketplace factors and (b) to produce a point scheme to "prove" discrimination against women.

One of the techniques by which this is done is the devaluing of the physical and working-condition factors so important in blue-collar jobs. This devaluation of blue-collar jobs is always an inevitable result of integrating white-collar and blue-collar jobs in the same

evaluation. If the Federal white-collar and blue-collar pay classifications were integrated, the blue-collar employees would be tremendously devalued because the Federal white-collar pay system accords less than 5% of the possible points to "physical demands" and "working environment" combined.

The Comparable Worth advocates and evaluators join in a chorus to claim that it's so "scientific" because "worth" is based on education, training, skills, experience, effort, responsibility, and working conditions. The fact is that, once you throw out marketplace factors, the evaluation is completely subjective and wholly reflective of the bias of the evaluator.

The Willis evaluation determined that the "mental demands" on a nurse are worth 122 points, whereas the mental demands on an electrician are worth only 30 points, and the mental demands on a truck driver are worth only 10 points. That's the view of the pro-feminist evaluator. For a contrary view, ask the electrician and the truck driver about the worth of their mental demands.

Comparable Worth evaluations must be recognized as a racket to get people with your own biases on the evaluation team, or to saddle the evaluator with a contract that binds him to produce the results you predetermine.

Not only is the Comparable Worth concept wholly subjective, but it is also wholly arbitrary. It proposes to raise only *some* women's pay at the expense of men and other women. This arbitrariness is shown by the fact that *only* those jobs where 70% or more of the employees are female would be eligible for Comparable Worth raises. This was made clear in a devastating analysis of the Wisconsin Governor's evaluation made by the Wisconsin Association of Manufacturers & Commerce.

The Wisconsin Governor's Task Force Study lists the job called Institution Aide as having a "C-W Gap" of \$5,132. But the employees in this position would not get a C-W raise because only 67% of the 116 employees are women and Institution Aide cannot be designated a "women's job" unless it meets the 70% test.

Now suppose that the state needs two more Institution Aides. If it hires two women, it will cross the 70% threshold. The state will then have to give all Institution Aides a raise, and it will therefore cost the state \$595,000 to hire two women. The personnel manager can easily manipulate the system, depending on whether he is pro-feminist or pro-budget-cutting.

Or, look at the position called Nursing Assistant 3. Because it has 70% women, all 104 employees would be scheduled to get a raise of \$3,626 to close the so-called C-W Gap. If the personnel manager simply hires one male or fires two females, he can avoid C-W raises for all and save \$377,136 in his budget.

The entire concept of Comparable Worth hangs on comparisons between male-dominated jobs and female-dominated jobs, so it is impossible to escape the arbitrary nature of the 70%.

In addition, Comparable Worth is unfair to women in that its effect is to squeeze lower-skilled women out of the job market altogether. The respected economist June O'Neill has written lengthy treatises to show how and why this is the result. Clarence Pendle-

ton, chairman of the U.S. Commission on Civil Rights put this same point succinctly when he said, "Comparable Worth would do to low-skilled women what the minimum wage did to black teenagers."

But that's not the only way Comparable Worth is unfair to women. It also hurts the women who have moved into nontraditional jobs.

When the Illinois nurses sued the State of Illinois, claiming they should be paid equally with the (mostly male) electricians and stationary engineers, eleven female state employees in nontraditional jobs tried to enter the lawsuit as intervenors. They all work in a job classification called Correctional Officer, which is a euphemism for Prison Guard. The evaluation said that these "male-dominated" jobs are not "worth" as much as they are now paid. Illinois was paying prison guards \$145 dollars a month more than entry-level secretaries, but the Comparable Worth evaluation gave secretaries 12 more Comparable Worth points than prison guards.

The women prison guards claimed that the present system of compensation properly rewards them for their special skills, performance of particularly difficult, dangerous and unpleasant work, their willingness to challenge stereotypes and perform nontraditional jobs, and the nondiscriminatory market forces of supply and demand. Put another way, the state has found that it must pay more to hire prison guards than office personnel because of the risks on the job and the unpleasant work.

Ask yourself the question, how many women would be willing to be a prison guard if the pay were the same or less than the pay of a secretary?

Women are already flooding into the so-called traditional "women's job" by the millions. If the pay is raised for those jobs, even more women will seek those jobs and abandon plans to go into nontraditional lines of work. At the same time, business will eliminate jobs in order to cut costs, and low-skilled women will be laid off. That's why Clarence Pendleton says that Comparable Worth for women is as self-defeating as saying, 20 years ago, that the way to improve the economic lot of blacks would be to raise the pay of Red Caps.

We are all aware that Comparable Worth has in recent months become a controversial issue in the media. The pro-feminist bias of the media has meant a pro-Comparable Worth bias on most television programs.

So it was with particular interest that I discovered a confidential and copyrighted memorandum on Comparable Worth distributed by the legal department of the National Association of Broadcasters for the benefit of its TV and radio station members. This memorandum warns stations to "think very carefully before undertaking any formal study of the relationship between the 'value' or 'difficulty' of the positions held by their employees and the salaries they receive." Be sure to consult your lawyer, the memorandum says. "If an employer's only motive is to protect itself against the hazards of new theories of wage discrimination like Comparable Worth, it is fair to say that a job evaluation study is far more likely to be a burden than a boon."

That's good advice, not only for television and radio broadcasters, but for any employer including the Federal Government and state governments.

# Trying to Measure the Unmeasurable

The essence of Comparable Worth is that your job "worth" should be determined by an evaluator instead of by the marketplace. To make this essentially radical notion appear plausible, its advocates claim that formal job evaluation is more than 100 years old, became widespread during World War II, and is used today by both government and private employers.

The truth is that only a small minority of businesses use job evaluations, and those that do use "benchmark" jobs to key wages to prevailing market rates. That system is fundamentally different from Comparable Worth.

Comparable Worth advocates seek a system which completely rejects the marketplace in determining job "worth." It is impossible for a Comparable Worth system to be just or objective because jobs, like commodities, have monetary "worth" only in relation to what someone is willing to pay. That's why Congress rejected Comparable Worth language in passing the Equal Pay Act of 1963.

Why do diamonds cost more than water? Water is infinitely more essential than diamonds. Price is obviously determined by many things other than intrinsic "worth"—such as supply and demand.

The National Academy of Sciences, whose reports are often cited by advocates of Comparable Worth, admitted that, "It must be recognized that there are no definite tests of the 'fairness' of the choice of compensable factors and the relative weight given to them. The process is inherently judgmental. . . ." Even Professor Ruth Blumrosen, the leading proponent of the Comparable Worth theory, concluded that job evaluation is inevitably a subjective and nontrustworthy process.

Any evaluation of jobs depends on an almost endless series of arbitrary and subjective judgments, including what factors to use as the basis for evaluating the jobs, how to rate the jobs under these criteria, and who should rate the jobs.

Even if the evaluation figures could be agreed upon by all, the persons designing the job evaluation system can still determine the results by the weight assigned to each factor. Even if the evaluators could shed their personal biases, they can still skew the results by choosing numbers within the allowable spread.

In the famous *AFSCME v. State of Washington* case now on appeal, the job evaluation of Washington State employees was made by Norman Willis and Associates. Under the Willis system, the "knowledge and skills" factor counts for between 46 and 244 points, whereas the "working conditions" factor counts for only between 0 and 30 points. That means that a secretary's knowledge and skills automatically count for more than a truck driver's working conditions, including the risk of getting killed on the highway. Whether that allocation of points is just or not is a matter of opinion, not a matter of fact.

*The Washington Monthly* published an article by Geoffrey Cowley which shows why the notion of setting wages according to "Comparable Worth" (CW) is a ridiculous idea. He analyzes the "point-factor job evalu-

ation systems" which are the linchpin on which the Comparable Worth notion rests.

In the famous case of *AFSCME v. State of Washington*, the evaluation concluded that laundry workers, who were mostly women, were paid 41 percent less than truck drivers, who were mostly men, even though their jobs had "comparable worth." Mr. Cowley dissects the exercise of figuring out how much a laundry worker is worth. The CW system is based on "a cheerfully mathematical view of qualities that you would think would be hard to quantify."

CW assumes that the worth of any job, from circus clown to key-punch operator, varies in relation to its "knowledge and skills," "mental demands," "accountability," and "working conditions." Each of these components is further broken down into two or three subcomponents, and points are awarded on the basis of each.

Under "accountability," you can win points for your "freedom to take action" as well as for the nature and size of your "impact." How do you quantify "impact"? CW consultants reply, "The simplest way to look at Size is to say the job most clearly impacts on something BIG, or on something LITTLE, or on something IN-BETWEEN."

The "knowledge and skills" component breaks down into "managerial," "interpersonal," and "technical" dimensions, each with its own rating. "Mental demands" come in two varieties: "judgment" and "problem solving."

The process works like this. A "team of metaphysicians" interviews workers and, after solemn mutual consultation, assigns each a job score. Thus, a clerk-typist in the Washington study became a 152 (made up of 106 on "knowledge and skills," 23 on "mental demands," 23 on "accountability," and 0 on "working conditions").

"A beginning licensed practical nurse scores 158 comparable worth points, while an Information Specialist III — an experienced PR flack — scores 324. Or look at a janitor, who scores 101, while an Advisory Sanitarian II — someone who doesn't actually clean anything himself, but makes sure local hospitals and nursing homes do — scores 395. Why on earth should our society value people who issue press releases or fill out reports all day long more than people who save lives and do the dirty work?"

**State of Washington Job Evaluation**  
by Norman D. Willis & Associates

How Much is a Job Worth?	Registered Nurse	Electrician	Clerk Typist	Truck Drivers
Knowledge & Skills	280	122	106	61
Mental Demands	122	30	23	10
Accountability	160	30	23	13
Working Conditions	11	11	0	13
Total	573	193	152	97

"The courts, too, would have to evaluate the working of an entire industry every time they heard a discrimination suit. Major civil rights battles would turn on such questions as whether error-free typing is a greater corporate asset than leak-free plumbing, or whether sitting at a video display terminal places greater strain on Betty's eyes than pipefitting places on Jack's back. And does Doris, the floor manager at Sears, 'most clearly impact on something IN-BETWEEN as opposed to something LITTLE?'"

Mr. Cowley concludes that Comparable Worth won't help end inequality, "it will enshrine it . . . through the use of questionably 'scientific' means to measure what is ultimately unmeasurable."

Comparable Worth means relying on some functionary's comparison of WORTH — not WORK. It has nothing to do with actual WORK at all. It prioritizes paper credentials over production, degrees over demand, and social theory over hard work. It is an incomparably bad idea because it is inherently unjust. No wonder the U.S. Commission on Civil Rights concluded in its recent 232-page study that the theory of Comparable Worth "is profoundly and irretrievably flawed."

### College Students and Their Future

The change in the general political climate on college campuses today from a year ago is as the difference between day and night. When Ronald Reagan won the votes of 62% of those in the 18 to 24 age group, he proved what a massive and lasting effect he is having on American culture.

Reagan has not only given America a new image. He has given our young people a new self-image and outlook on life, with faith in the future and confidence that they can realize and keep the fruits of their labors.

His Reaganomics, smirked at by the media four years ago, has proven to be a success. The last two years have been the most remarkable period of new private-sector job creation in the history of the world, and the prospect of a job is the best lure to lift the hopes of college students.

But all college graduates don't get good jobs. A recent report by the Association of American Colleges shows that too many college students do not use their "academic freedom of choice" to select courses which give them a good education and prepare them for the real world. Too many waste their years on easy, dead-end, or frivolous courses.

Motivation, talent and ability come in all varieties and combinations, and fortunately money is not the primary goal of all of us. But someone ought to give college students a look at the employment picture before they squander their parents' financial sacrifices or their student loans on a college experience that has no marketable worth.

A good place to start would be the Northwestern Endicott Report for 1985. This 39th annual survey of

employment trends for college graduates in business was compiled from data supplied by 250 corporations.

Here are the monthly salaries which the Class of 1985, graduating with Bachelor's degrees with various majors, will receive, according to the Endicott charts. The first figure for each major is the minimum expected salary, and the second figure is the salary offered by the most number of companies. Engineering: \$1,400, \$2,200; Chemistry: \$1,600, \$1,900; Computer: \$1,400, \$1,900; Accounting: \$1,300, \$1,600; Mathematics and Statistics: \$1,300, \$1,900; Economics and Finance: \$1,100, \$1,700; Sales Marketing and Business Administration: \$1,100, \$1,500; Liberal Arts: \$1,000, \$1,400.

The college majors in the most demand are Electrical Engineering and Computer Science. The next most frequently mentioned majors are Mechanical Engineering, Accounting, and Mathematics.

The Endicott Report provides a convincing refutation of those who claim that the "wage gap" between men and women is due to discrimination. So far as men and women in their twenties are concerned, the alleged male/female "wage gap" is due to the fact that the higher-paying majors graduate a majority of men and the lower-paying majors graduate a majority of women.

Federal laws require the corporate recruiters to be gender-neutral in their interviewing and job offers. But they can't offer an engineering job to a graduate who majored in sociology; nor should any government agency presume to require equal salaries.

Of course, those who major in sociology or history or other liberal arts subjects have just as much "worth" in the sight of God and their families; and certainly money is not the only reason to choose a college major. But the students should know the consequences of their career choices, and that their "worth" in the marketplace is a compromise between what they would like to earn and what some employer is willing to pay.

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*Eagle Forum Education & Legal Defense Fund held a two-day Conference on Comparable Worth in Washington, D.C., October 17-18, 1983, at which all points of view were presented. The proceedings of this conference, published in a 270-page book entitled **Equal Pay for UNEqual Work**, have become the major resource on this subject used by legislatures, commissions, libraries, and universities. The editor of this book, Phyllis Schlafly, attorney and president of Eagle Forum, appears nationally in lecture and debate on Comparable Worth.*

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