
From: Shauna Holman Harries <shauna.holman.harries@oracle.com>
To: Atkins, Hea Jung K - OFCCP <Atkins.HeaJung@dol.gov>
CC: Neil Bourque <neil.bourque@oracle.com>; Luong, Hoan - OFCCP <Luong.Hoan@dol.gov>; Mikel, Brian L - OFCCP <Mikel.Brian@dol.gov>
Sent: 3/13/2015 7:58:37 PM
Subject: RE: HQCA

Thanks for your reply Hea Jung. But, I think you misunderstand my concerns and avoided my request. As you know, my team and I have worked diligently and closely with virtually every OFCCP region and many offices over the past two years in 39 compliance reviews. In every review, we have found your OFCCP colleagues to be cooperative and transparent in all of their dealings and more importantly, identifying the specifics of any concerns they might have and explaining the basis for any supplemental requests. In all of these reviews, we were able to promptly discuss and/or fully respond and address any OFCCP concerns, including the few instances where a compliance officer identified what she/he regarded as an indicator of potential bias. In every such instance, the detail provided to us was sufficient for us to do the appropriate research and address satisfactorily the OFCCP's concerns.

My concerns are not with OFCCP's approach to aggregating data. My concerns are those as expressed and I don't feel a need to repeat them. I will add, however, that I feel that OFCCP, for some reason, is unwilling in this instance to be forthcoming and provide us with sufficient information to enable us to work with OFCCP and to have some reasonable and basic understanding of what OFCCP is looking at or looking for. I must confess that given my work and experience with OFCCP's practices in every other region I feel that here OFCCP is, for some unexplained reasons, avoiding a transparent and cooperative approach to its identifying, and enabling us to address, any perceived concerns. It is in that context that I also raised the issue of aggregation by Job Group as you do note. I again request a response with regard to details.

I hope to hear from you soon. In the meantime, have a good weekend. I hear the weather in San Francisco will be almost as warm as here in Phoenix.

Shauna

From: Atkins, Hea Jung K - OFCCP [mailto:Atkins.HeaJung@dol.gov]
Sent: Friday, March 13, 2015 10:24 AM
To: Shauna Holman Harries; Mikel, Brian L - OFCCP
Cc: Neil Bourque; Luong, Hoan - OFCCP
Subject: RE: HQCA

Hi Shauna,

Thank you for your response. Your concerns regarding our aggregation techniques during the initial analysis have been noted. However, at this time we are proceeding as discussed in the March 12, 2015 correspondence from Brian Mikel. Within that correspondence, you were also informed that our interview list is forthcoming which will naturally provide guidance as to the employees we would like to speak with. Moreover, as you may be aware, an exit conference will be held to provide specificity to our initial findings at the conclusion of the onsite. We look forward to your continued cooperation throughout the investigative process and await receipt of the pending data requests.

Thank you,
Hea Jung

From: Shauna Holman Harries [mailto:shauna.holman.harries@oracle.com]

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5.1

Sent: Thursday, March 12, 2015 3:52 PM
To: Mikel, Brian L - OFCCP
Cc: Neil Bourque; Atkins, Hea Jung K - OFCCP; Luong, Hoan - OFCCP
Subject: RE: HQCA

Hi Brian. We appreciate your response but unfortunately it doesn't provide us with any detail so we have no idea what specifically to look at. Further, you've asked for an enormous amount of detail for all headquarters employees. You make reference generally to race/ethnicity and to technical Job Groups. However, the information you have provide us gives no detail or direction on what we should look at or how we might even begin to address any perceived concerns. Moreover, as I'm sure you know, reference to AAP Job Groups affords no relevant or meaningful comparison for any purpose – certainly not hires or pay. We provided detailed information in the desk audit response that identified employees and their most relevant comparators in the same job title, dept, etc. Oracle's job structure and related hiring and pay decisions have nothing to do with Job Groups. We understand that OFCCP might choose to aggregate data by Job Group, but I don't see how that can result in any meaningful analysis or identify any relevant indicators in any of the job in PT1, 2 or 3.. Please advise ASAP if you have anything more detailed.

Thanks you.

Shauna

From: Mikel, Brian L - OFCCP [<mailto:Mikel.Brian@dol.gov>]
Sent: Thursday, March 12, 2015 10:21 AM
To: Shauna Holman Harries
Cc: Neil Bourque; Atkins, Hea Jung K - OFCCP; Luong, Hoan - OFCCP
Subject: RE: HQCA

Hi Shauna,

Our preliminary desk audit indicators are primarily in compensation and hiring based on gender and race/ethnicity. As you'll find when we send the list of employee and manager interviews, the majority of the job titles are within the PT1, PT2 and PT3 job groups.

An updated database as soon as possible (does not necessarily need to include every item in last request) will help us focus our time and interviews while on-site. Company tenure and time in job information, as you know, is important information that was not included in previous submissions.

I will be on leave until next Wednesday, please forward any future correspondence to Hea Jung Atkins and Hoan Luong and cc me.

Thank you,
Brian

From: Shauna Holman Harries [<mailto:shauna.holman.harries@oracle.com>]
Sent: Wednesday, March 11, 2015 9:11 AM
To: Mikel, Brian L - OFCCP
Cc: Neil Bourque
Subject: RE: HQCA

Not sure if you saw this request. Would you please send us the indicators?

From: Shauna Holman Harries
Sent: Monday, March 09, 2015 1:26 PM
To: Mikel, Brian L - OFCCP
Cc: Neil Bourque

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5.2

Subject: HQCA

As a follow up to our telephone call I wanted to ask you what, if any, indicators have you found in your initial analysis? You have not said anything with regard to the identification of any indicators so far. Please advise.

Best Regards,
Shauna Holman-Harries

ORACLE

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