

available *individual or similar detailed* employment data to conduct a regression, logit or similar analysis. With such an analysis, such as the Peters-Belson method,<sup>12</sup> one could develop a mathematical model to predict management position status (appropriately defined) based on a variety of individual characteristics including degree field, degree level, current and prior position type, level of experience and potential age at degree attainment, for the general population. Using this model, one could apply the formula to the Asian American population to predict the level of management positions this class would be expected to hold and if they were treated the same as the general population. In turn, one could then compare these expected counts to the actual figures, similar to those in the constituent's table, to gauge the presence of any "glass ceiling" phenomenon. While we have only addressed the overall employment and educational profile of Asian Americans in the general workforce population in this response, we suggest that such methods also would be useful for studying the glass ceiling issues in academia and government.

Lastly, we note that the previously mentioned report, "We the People: Asians in the United States," shows that 45 percent of Asian Americans were employed in management, professional and related occupations, compared to 34 percent of the total population. The report also indicates that Asian American men and women who worked full-time had higher median earnings than all other men and women. The median income of Asian American families was over \$9,000 higher than the median income of all families in 1999.

In sum, while this Delaware constituent has usefully raised an issue that OFCCP has worked diligently on for a number of years, his work product fails to meet minimum standards for scholarly research and meaningful statistical analysis.

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<sup>12</sup> See as one reference, Nayak, Tapan, K., Gaswirth, Joseph, L. (1995) Statistical Measures of Economic Discrimination Useful in Evaluating Fairness, Proceedings of the Biopharmaceutical Section of the American Statistical Association, pages 87-94