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Sent: Wednesday, December 21, 2016 10:54 AM
To: Chief Evaluation Office
Cc: Hill, Joan
Subject: OMB Control No. 1205-0NEW Department of Labor

Ms. Yancey, please find attached comments submitted on behalf of the United Steelworkers International Union.

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December 21, 2016

Via Email: ChiefEvaluationOffice@dol.gov

Christina Yancey
Chief Evaluation Office
OASP
U.S. Department of Labor, Room S-2312
200 Constitution Avenue, N.W.
Washington DC 20210

Re: OMB Control No. 1205-ONEW

Submitting Comments:

U.S. Department of Labor

The United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (USW) is the largest industrial union in North America, representing workers in a range of industries including metals, mining, rubber, paper and forestry, oil refining, health care, security, hotels, and municipal governments.

Although many issues affect the daily lives of USW members, we cannot ignore the conflict that so often arises between balancing the demands of our work and earning a living with the obligations of family. The Department of Labor's solicitation for comments on the proposed surveys – especially the proposed survey of employees – is at the heart of our work in educating our membership on their statutory rights under the Family and Medical Leave Act and bargaining for greater rights through collective bargaining. Only through input from workers, and in our case, the employees we represent in bargaining, can the Department accurately understand the issues faced when employees use leave, need leave, and their experiences with FMLA-eligible leave.

Through our Education and Membership Development Department, we offer onsite education programs for our members all over the United States. Whether it is a one-day program or several days in length, through education, we have learned the issues most often facing our membership when it comes to applying for leave, and the problems encountered

when employers administer leave—the “pain points” as I refer to them. Often, an additional layer is added to the process, when employers decide to outsource the administration of leave—a phenomena that has taken hold only over the past decade.

In addition, with the total overhaul of regulations in 2008, effective in January 2009, our Union has had ample time to garner experience under the new regulations and specifically what works for employees, and what doesn't. For example, the impact of FMLA utilization concurrently with other paid time off—where the regulation (§825.207) was revised in 2008. Also, the utilization of third-party administrators and other disability management programs that coordinate short-term disability, workers' compensation and FMLA has caused further delay, in our opinion, in approving FMLA leave requests.

The USW welcomes additional data collection on utilization, experience and management of leave. We stand ready to assist in gathering information from affected workers.

Respectfully submitted,



Joan G. Hill

Education and Membership Development Department

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