



September 8, 2017

Erin Good
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue NE
Washington, DC 20212

Re: Request for comments on proposed extension to the Leave Supplement to the American Time Use Survey

On behalf of the Center for American Progress (CAP), we are writing in response to the Notice 82 FR 31787 published in the Federal Register on July 10, 2017, which seeks comment regarding the proposed extension to the Leave Supplement to the American Time Use Survey.

CAP is a nonpartisan think tank dedicated to improving the lives of Americans through bold, progressive ideas and action. As part of its core mission, CAP conducts research and develops new policy ideas that help improve economic security for Americans, including balancing what are often untenable demands between work and family, and enhancing quality of life.

High-quality data that provide information about trends over time and small populations are essential to CAP's work. Thus, we have consistently advocated for adequate federal funding for existing data collection efforts, as well as for increased data collection on topics that suffer from insufficient information, including paid leave.

We believe that the Leave Supplement provides important insight into workers' ability to balance care and work responsibilities. In recent years both the labor market and the nature of work itself have undergone significant shifts. Today, two-thirds of mothers are their household's sole breadwinner or are responsible for at least a quarter of their household income.ⁱ Employment in the service sector has risen sharply in the past decades and is expected to continue to increase.ⁱⁱ In the name of economic efficiency, these employers have resorted to practices such as on-call and automated scheduling, leaving workers with less control over their hours. These changes impact caregiving responsibilities such as tending to an illness, helping raise a child, or caring for an elderly parent (which, as the population ages, is posing a growing financial burden on middle-aged Americansⁱⁱⁱ).

Given these changes, as well as the dearth of data regarding paid leave and job flexibility, we believe the Leave Supplement provides essential information regarding the labor market and caregiving practices. The notice invites comments on "whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility." **We strongly support the proposed extension, and believe it is necessary for agency function and has practical utility across a**

variety of areas of political and economic concern.

In light of the aforementioned economic and demographic trends, the Leave Supplement allows the Department of Labor—as well as other entities and researchers—to keep up with the labor market’s many shifts, and better understand what those shifts mean for job quality and quality of life. Since its inception, the Leave Supplement has provided critical information about the circumstances under which workers are permitted to take paid and unpaid leave, their use of leave, and the extent to which workers can adjust their schedules to balance personal and work obligations instead of taking leave. The proposed extension will enhance the rigor and accuracy of the Leave Supplement’s data, which will only increase its practical utility.

The Leave Supplement has been critical to CAP’s work in this area. Our analysis of the 2011 data found that even though parents are more likely to need to take paid leave, they are only slightly more likely to be able to do so. For example, 55 percent of mothers had access to paid parental leave, compared to 53 percent of women without children; an even larger gap existed for men.^{iv} The Leave Supplement has informed the work of countless other non-profit organizations, such as the Institute for Women’s Policy Research and the Brookings Institution, and has been used to inform policy proposals in this area.^v Academic researchers have also made use of these data to examine access to sick leave.^{vi} Moreover, it has enabled the Department of Labor to conduct rigorous analyses of its own in order to understand which workers have access to paid leave, how they make use of it, and, perhaps most importantly, who is denied this flexibility.^{vii}

With the proposed extension, the survey will yield a larger sample size, increasing the study’s rigor and accuracy. For certain subpopulations, including Hispanic and non-Hispanic black workers, the proposed extension will be particularly useful, as the larger sample size will facilitate a deeper and more accurate understanding of access to paid and unpaid leave among racial and ethnic groups. In addition, the proposed extension will yield more data on different household types—including those with and without children, and with and without multiple household heads. As policymakers formulate proposals around paid leave, flexible scheduling practices, affordable child care, and long-term care options, the proposed extension will enable them to better tailor legislation to the needs of today’s workers.

The notice invites comments on whether to “minimize the burden of the collection of information on those who are to respond.” **We believe that the proposed method of data collection represents a minimal imposition to respondents.**

Survey response time averages just five minutes per respondent, which requires very minimal commitment from participants. The Leave Supplement therefore effectively balances the quality of information collected with ensuring that respondents are not overburdened.

Finally, the notice invites comments on how to “enhance the quality, utility, and clarity of the information being collected.” **We believe that future iterations of the Leave Supplement stand to benefit from additional sets of questions.**

While the Leave Supplement currently asks respondents about their ability to vary their own schedules, and how far in advance workers know their schedules, we believe that an additional

set of questions about how often their managers vary their schedules and numbers of hours worked would yield important insight into job quality and flexibility. These questions would be particularly useful as employment in the service sector continues to grow, and automated scheduling technology—which allows employers to schedule workers based on when demand for services is greatest—grow more prevalent. We also recommend establishing a process to identify subpopulations not included in the demographic categories in the current version of the survey, such as LGBTQ communities, and work to include additional questions in future surveys.

The proposed extension of the Leave Supplement will enhance the rigor and accuracy of its data, in turn leading to policy proposals and legislation that is tailored to the needs of today's workers in an ever-changing economy.

Sincerely,

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ⁱ Sarah Jane Glynn, "Breadwinning Mothers, Then and Now" (Washington: Center for American Progress, 2014), available at <https://cdn.americanprogress.org/wp-content/uploads/2014/06/Glynn-Breadwinners-report-FINAL.pdf>.

ⁱⁱ Bureau of Labor Statistics, "Employment by major industry sector," available at https://www.bls.gov/emp/ep_table_201.htm (last accessed August 2017).

ⁱⁱⁱ Kim Parker and Eileen Patten, "The Sandwich Generation: Rising Financial Burdens for Middle-Aged Americans" (Washington: Pew Research Center, 2013), available at <http://www.pewsocialtrends.org/2013/01/30/the-sandwich-generation/>.

^{iv} Sarah Jane Glynn, "Working Parents' Lack of Access to Paid Leave and Workplace Flexibility" (Washington: Center for American Progress, 2012), available at <https://www.americanprogress.org/wp-content/uploads/2012/11/GlynnWorkingParents-1.pdf>.

^v See, for example, Barbara Gault and others, "Paid Parental Leave in the United States: what the data tell us about access, usage, and economic and health benefits" (Washington: Institute for Women's Policy Research, 2014), available at <https://iwpr.org/wp-content/uploads/wpallimport/files/iwpr-export/publications/B334-Paid%20Parental%20Leave%20in%20the%20United%20States.pdf>; Aparna Mathur and others, "Paid Family and Medical Leave: An Issue Whose Time has Come" (Washington: AEI-Brookings Working Group on Paid Family Leave, 2017), available at https://www.brookings.edu/wp-content/uploads/2017/06/es_20170606_paidfamilyleave.pdf.

^{vi} See, for example, Philip Susser and Nicolas R. Ziebarth, "Profiling the U.S. Sick Leave Landscape: Presenteeism among Females," *Health Services Research* 51 (6) (2016): 2305-2317.

^{vii} See, for example, Bureau of Labor Statistics, "Access to and Use of Leave—Data from the American Time Use Survey" (2012) available at <https://www.bls.gov/news.release/pdf/leave.pdf>.

