



September 8, 2017

Attn: Erin Good, BLS Clearance Officer
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

Dear Ms. Good:

Thank you for inviting comments on the Department of Labor (DOL) and the Bureau of Labor Statistics' (BLS) proposed extension of the Leave Supplement to the American Time Use Survey (ATUS) through 2018. We support the extension of data collection through 2018 because it will further enrich the quality of the data currently collected in the Leave Supplement and provide additional data on subpopulations not previously available in a one-year data collection. The data collected in this two-year Leave Module will support BLS's mission of providing relevant information on economic and social issues and assist researchers in understanding workers' connections to and barriers from engagement in the labor force as well as their ability to access paid and unpaid leave and work flexibility.

The National Partnership for Women & Families is a nonprofit, nonpartisan organization that uses public education and advocacy to promote fairness in the workplace, reproductive health and rights, quality health care for all, and policies that help women and men meet the dual demands of work and family.

The U.S. workforce has changed considerably in recent decades, including since data were collected in the 2011 Leave Module. Today, two-thirds of mothers are breadwinners or co-breadwinners, and in most households with children all parents work. As a result, workers are increasingly engaged in caring for children as well as older family members. Workers are also more frequently working beyond the standard retirement age, resulting in a greater likelihood that, at some point, they will need time away from work to deal with their own health issues. Paid family and medical leave, paid sick days and flexible work arrangements play a central role in helping working people meet the dual demands of work and family. The nature of work is also rapidly changing. For example, new technologies have resulted in greater potential for flexible work arrangements, such as teleworking, as well as in changes to scheduling practices that result in unsteady and unpredictable hours for some shift workers. The two-year Leave Module will evaluate the extent to which access to leave and flexible work arrangements are supporting working people with greater rigor and accuracy.

The extension of data collection from one to two years will increase the utility of the Leave Supplement significantly. While the Leave Supplement currently provides a nationally representative picture of workers' access to paid family and medical leave, paid sick days, and flexible work arrangements, the proposed extension would provide data on additional groups, including subpopulations of women, men and parents. Data on these subpopulations – for example, access to leave for women in certain occupations or parents by race – will help DOL, BLS and researchers compare the extent to which different workers' needs are met. This will help DOL develop and prioritize better target its policy, outreach and education activities, provide technical assistance to states, and better address the challenges facing employers and the workforce. Likewise, this data will help BLS fulfill its mission with respect to the provision of social and economic data. Finally, this extended Leave Module will help policymakers better understand and support the needs of more working families.

The proposed method of data collection would be a minimal imposition on respondents. Survey response time averages just five minutes per respondent. The Leave Supplement therefore effectively balances the quality of information collected with ensuring that respondents are not overburdened.

While the Leave Supplement currently asks respondents about their ability to vary their schedules, and how far in advance they know their schedules, an additional set of questions could be included about how often managers change respondents' schedules and number of hours worked. Such questions 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—becomes 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.

Thank you for the opportunity to comment on the extension of the 2017 Leave Module to the ATUS. If you have questions about this comment, please contact Sarah Fleisch Fink, Director of Workplace Policy and Senior Counsel (sfleischfink@nationalpartnership.org or 202.986.2600) or Julia Kortrey, Policy Associate (jkortrey@nationalpartnership.org or 202.986.2600) at the National Partnership for Women & Families.

Sincerely,

National Partnership for Women & Families