



national partnership for women & families

Because actions speak louder than words.

January 17, 2012

Nora Kincaid
BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue, NE
Washington, DC 20212

Re: Comments on the Proposed Revision of the National Compensation Survey

Dear Ms. Kincaid:

On behalf of the National Partnership for Women & Families and the undersigned organizations, we thank you for the opportunity to respond to the Department of Labor's request for comments on the proposed revision of the National Compensation Survey ("NCS").

The NCS plays an important role in the development of economic policies. It is used by the private sector to determine costs of pay and benefits, for research purposes, and to set wages for private contracts. Furthermore, the information gathered through the NCS informs the level of pay received by federal workers and helps private firms evaluate and administer compensation packages.

In light of the influence of NCS data on compensation and benefits in both the public and private sectors, the content of the survey is critically important. However, the current survey design does not include questions designed to collect sex-specific data to identify gaps in pay and access to benefits between men and women. This omission is particularly troubling in light of the fact that on average, women earn just 77 cents on average for each dollar earned by their male counterparts.¹ And in the public sector, a recent GAO study concluded that a significant pay gap persists for women in the federal workforce.² Yet, the NCS fails to consider these disparities in collecting critical data. Given the many ways the survey is used, the survey data could be used to perpetuate existing pay gaps to the detriment of women and their families.

The NCS also plays an important role in estimating workers' access to important benefits such as paid sick leave, paid family leave and temporary disability insurance. These benefits are particularly critical to women's economic security. The vast majority of women are in the labor force, and many will need time off during and following pregnancies, to care for newborn or newly adopted children, or to care for an ill family member. Without access to paid leave,

¹ Institute for Women's Policy Research (2011). *The Gender Wage Gap: 2010*,

http://www.iwpr.org/publications/pubs/the-gender-wage-gap-2010-updated-march-2011/at_download/file

² Government Accountability Office (2009). *Gender Pay Gap in the Federal Workforce Narrows as Differences in Occupation, Education, and Experience Diminish*. <http://www.gao.gov/assets/290/287375.pdf>.

women risk their financial and job security. Quantifying women's access to these benefits will help to frame policy proposals and employer best-practices.

In addition, we urge BLS to modify the questions it asks and the analysis it publicly releases regarding workers' access to paid sick leave and paid family leave. BLS reports on NCS data do not account for probationary periods or other tenure requirements that workers must satisfy before they are able to use employer-provided leave. As a result, BLS's reported estimates of workers' access to leave overstate the percentage of workers who are able to use paid sick leave or paid family leave. The BLS should revise the instrument and its analytic tables to reflect workers' ability to use these critical types of leave.

We urge BLS to consider expanding the survey to capture gender-related compensation and benefits information that could help to assess disparities in compensation and avoid the risk of perpetuating the pay gap. We also urge BLS to measure and report on gender- and tenure-related disparities in access to leave that create barriers to workers' economic security.

We appreciate this opportunity to submit comments about this survey. If you have any questions, please contact Sarah Crawford or Vicki Shabo of the National Partnership for Women & Families or 202-986-2600.

Sincerely,

National Partnership for Women & Families

9to5, National Association of Working Women
A Better Balance
American Association of University Women (AAUW)
American Civil Liberties Union
Catalyst
Federally Employed Women (FEW)
Legal Momentum
National Committee on Pay Equity
National Gay and Lesbian Task Force
National Organization for Women
National Women's Law Center
Wider Opportunities for Women
Women Employed