



November 29, 2016

Sent via email to Rowan.Carol@bls.gov

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

Re: Proposed Contingent Worker Supplement to the Current
Population Survey, OMB Number 1220-0153

Dear Ms. Rowan:

The Service Employees International Union (SEIU) submits the following comments on the proposed Contingent Worker Supplement (CWS) to the Current Population Survey (CPS), OMB Number 1220-0153.

SEIU represents 2.2 million workers, advocating to improve workers' lives and the services that they provide. SEIU members include healthcare workers (including nursing home and home care workers), property services workers (including janitors, maintenance workers, security workers, window cleaners, and doormen and women), public service workers (including bus drivers and child care providers), and higher education adjunct and non-tenure track faculty.

Many of the industries in which SEIU's members are employed are ones in which nontraditional employment arrangements exist and, in some cases, are rapidly expanding. SEIU is well aware that U.S. workers have experienced a significant, long-term trend away from full-time, secure jobs with benefits and towards the increased "fissuring" of work – the expansion of part-time, contingent, contracted, on-call, temporary, outsourced, and /or "gig economy" work. These trends have been primarily driven by employers' desires for worker flexibility, managerial control, and corporate profit. SEIU has a strong interest in ensuring that workers – both SEIU members and nonmembers – who may work in nontraditional employment relationships themselves, or who work in industries where nontraditional employment relationships are common or expanding, have strong workplace standards, benefits, and protections.

We understand that the current proposal is to reinstate the CWS and expand it by four questions that specifically address how the internet and mobile apps have led to new types of work arrangements. However, SEIU believes that a broader reassessment and expansion of the CWS would be very beneficial. Current data and information on the contingent workforce comes from various sources and is incomplete, leading to a wide variety of results by those trying to quantify its size, makeup, characteristics, and level of financial stability and wellbeing.

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In addition, more detailed and industry-specific questioning about industries particularly prone to fissured workplaces would be very helpful. One example of an industry that would benefit from such a focus is higher education, in which SEIU represents adjunct and non-tenure track faculty. The expansion of non-traditional faculty jobs in higher education has meant that teaching and research jobs once considered prestigious and family-supporting are now often marginalized, temporary, and low-paying. Like other workers, higher education faculty experience some factors and scenarios unique to their field, such as online courses and academic calendars. The changes in this particular area of work – as in others – mean that the generalized questions of the CWS are not necessarily sufficient to surface and provide data on the particular types of challenges and circumstances that these workers face.

For these reasons, we urge the BLS to fully reassess and revamp the CWS to bring it up to date, as well as expand it to develop industry-specific areas of questioning.

Thank you for your consideration of these comments. Please do not hesitate to contact Audrey Richardson, Deputy Policy Director, at audrey.richardson@seiu.org, if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Arun Ivatury', with a stylized flourish at the end.

Arun Ivatury
Director of Policy
Service Employees International Union