



Division of Pulmonary and Critical Care Medicine

5501 Hopkins Bayview Circle
Baltimore, Maryland 21224

1 September 2017

Ms. Erin Good, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics
2 Massachusetts Ave, NE, Room 4080
Washington, DC 20212

Dear Ms. Good:

The American Academy of Sleep Medicine welcomes the opportunity to provide comments on and to convey its strong support for the proposed extension of the *Leave Supplement to the American Time Use Survey* (82 FR 31787).

As you know, the *American Time Use Survey (ATUS)* is used to develop nationally representative estimates of how people spent their time and offers critical insights that complement those obtained from experimental and epidemiological studies. The *Leave Supplement* provides additional information about workers' access to and use of leave, job flexibility and their work schedules. Importantly to researchers, policy makers and others seeking to understand the relationships between work and sleep, the *Leave Supplement* is the only portion of these surveys that systematically collects data on whether survey respondents engage in shift work. It does so by providing respondents the opportunity to succinctly describe whether they perform different types of shift work (i.e., evening, night, rotating, split, irregular and other shifts) by answering a single question. A different question elicits the reasons motivating American workers to engage in shift work. Questions from the *Leave Supplement* also explore whether workers have job flexibility to work from home, and their opportunities to take leave. The Leave Module is estimated to take only 5 minutes to complete, thus imposing minimal burden on participants.

Given the increasingly 24-hour nature of the American economy, advancements in technology that allow many employees to work remotely and on non-traditional schedules, and the relative scarcity of data collected in a methodologically rigorous way on the impacts of these changes on workers' sleep and general health, the *ATUS* and *Leave Supplement* are important tools that support the mission of the Bureau of Labor Statistics by capturing rapidly occurring shifts in how work is being performed across the United States. Analyses of these data are likely to inform discussions and decisions among policy makers, researchers, workers, employers and other stakeholders. The *Leave Supplement* is an especially important adjunct because sleep-related findings from the *ATUS* itself (which quantifies self-reported sleep) have at times been discordant with other widely disseminated data sources including the CDC-funded *Behavioral Risk Factor Surveillance System (BRFSS)*. One example is in the *ATUS*' report of prolonged sleep duration >9 hours among adults >15 years of age, which differs sharply with the CDC's report of more than one third of workers reporting short sleep duration <7 hours. Such disparities create confusion for the media and the public: additional information from the Leave Supplement regarding work status and shift work can provide appropriate context for these findings. Separately differentiating data from *ATUS* on the duration of the major sleep period and nap duration in future reports would provide additional relevant information.

In summary, the AASM strongly supports the *ATUS Leave Supplement* and specifically the retention of questions about work schedules and shift work, and recommends differentiating reports of all time spent sleeping by major sleep period and naps. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Grace W. Pien". The signature is fluid and cursive, with a large loop at the end.

Grace W. Pien, M.D., M.S.C.E.
Assistant Professor of Medicine