

September 8, 2017

Movement Advancement Project
3020 Carbon Place, Suite 202
Boulder, CO 80301

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

Ms. Good:

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.

Founded in 2006, the Movement Advancement Project (MAP) is an independent think tank that provides rigorous research, insight and analysis to speed equality for lesbian, gay, bisexual and transgender (LGBT) people. As part of its core mission, MAP tracks laws and policies across the country that support paid and unpaid sick and family leave for workers and their families, including same-sex couples and parents who may lack a legal relationship to their children. We analyze these laws (and laws preempting sick and family leave for workers) and their impact on LGBT workers and their families.

High-quality data that provide information about trends over time and small populations are essential to MAP's work. We advocate strongly for data collection, particularly about LGBT populations, and on the efficacy of local, state, and federal programs and services.

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. Employment in the service sector has risen sharply in the past decades and is expected to continue to increase. 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 Americans).

LGBT workers face particular challenges. More than half of states (28) still lack employment laws that prohibit discrimination on the bases of sexual orientation or gender identity. And far fewer states offer comprehensive family leave that explicitly includes LGBT workers. In fact, only 12 states offer any leave for workers to care for a same-sex partner, and in eight of those states, the couple must have a legally recognized relationship.

Given these changes and challenges, 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.

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 data on workers’ sexual orientation, marital status, and gender identity.

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,
Ineke Mushovic
Executive Director
Movement Advancement Project