

## SUPPORTING STATEMENT A

### A. JUSTIFICATION

#### 1. Necessity of the Information Collected

The 2017 Leave Module is collected in the American Time Use Survey (ATUS) under OMB Control Number 1220-0191 with an expiration of June 30, 2018. The purpose of this request for review is for the Bureau of Labor Statistics (BLS) to obtain approval for an extension of the collection of the Leave Module through December 2018. The proposed questions appear in Attachment A. As part of the ATUS, the module will survey employed wage and salary workers, except those who are self-employed, who are ages 15 and over. Respondents will be selected from a nationally-representative sample of approximately 2,060 sample households each month. If approved, the Leave Module questions will be asked immediately after the ATUS, and will follow up on some of the information ATUS respondents provide in their time diary. (The time diary is a section of the ATUS interview in which respondents report the activities they did over a 24-hour period that mainly encompasses "yesterday," or the day before the interview.) The Leave Module is sponsored by the Department of Labor's (DOL) Women's Bureau.

The collection of the Leave Module in 2018 is another effort to gather data on workers' access to and use of paid and unpaid leave. The Leave Module, as described above, was also attached to the ATUS in 2011, and collected under the OMB Control Number 1220-0175. The proposed 2018 module will be the same as the 2017 version and will collect data on worker's access to and use of leave, leave activities (e.g., instances of leave taking, leave denials, and non-use of leave), job flexibility, and their work schedules.

The ATUS is the Nation's first federally-administered, continuous survey about time use in the United States. The survey is sponsored by BLS and conducted by the U.S. Census Bureau. In the ATUS, a nationally-representative sample of persons from households completing their final month of interviews for the Current Population Survey (CPS) is drawn for the ATUS. From each household, one person age 15 or older is selected for a one-time ATUS interview. The primary focus of the interview is on collecting the time diary, although additional questions are asked to determine the respondent's labor force status and household composition.

Collection of time-use data fits well within the BLS mission, as outlined in Title 29, United States Code, Section 1:

"The general design and duties of the Bureau of Labor Statistics shall be to acquire and diffuse among the people of the United States useful information on subjects connected with labor, in the most general and comprehensive sense of that word, and especially upon its relation to capital, the hours of labor, the earnings of laboring men and women, and the means of promoting their material, social, intellectual, and moral prosperity."

## 2. Needs and Uses

The data from the proposed Leave Module will support the BLS mission of providing relevant information on economic and social issues. The data will provide a richer description of work, specifically workers' access to paid and unpaid leave, the reasons for which workers are able to take leave, leave activity, and information about job flexibilities and work schedules. The module will also provide more information on the relationships between work schedules, job flexibilities, and time use. Some information about leave is available from other surveys, such as the BLS National Compensation Survey, but these data are collected from establishments. The proposed ATUS Leave Module will collect leave information from individuals, allowing for the production of nationally-representative estimates for the U.S. civilian noninstitutional population and various subpopulations, such as by race, ethnicity, and sex. Many of the proposed questions about job flexibilities and work schedules are based on questions last collected in May 2004, as a "Work Schedules and Work at Home Supplement" to the Current Population Survey.

The data from the Leave Module closely support the mission of the module's sponsor, DOL's Women Bureau, to identify, research, and analyze the topics working women care about. Some of the questions that can be answered by analyzing the proposed module data include:

- What are the characteristics of people with access to paid leave? Those with access only to unpaid leave?
- In which occupations do workers have the greatest and least access to paid leave?
- For what reasons are workers able to take leave from their jobs?
- How many workers have access to job flexibilities such as the ability to work from home or to adjust their start and stop times? What are the characteristics of people with and without access to job flexibilities?
- What is the relationship between workers' time use and their access to job flexibilities?
- On days they work, how does time use vary for those who work at home compared with those who work at their workplace?

The Leave Module data files are intended to be used as a data set for researchers. The 2011 Leave Module data were made available to the general public in August 2012. In addition, BLS published a news release summarizing the results (available at [www.bls.gov/news.release/leave.nr0.htm](http://www.bls.gov/news.release/leave.nr0.htm).)

Data from the 2017 Leave Module are still being collected and processed, and they have not yet been released.

3. Use of Information Technology

The U.S. Census Bureau, which collects and processes the data for BLS, uses state-of-the-art methods to conduct interviews and record respondent information. Census Bureau interviewers conduct all interviews over the telephone, completing the respondent's time-use diary using Computer Assisted Telephone Interviewing (CATI). Using an automated call scheduler and hourly reports from the system, cases are presented to interviewers in order depending on respondents' designated interview days, pre-set appointment times, CPS information on the best time to call respondents, and other information.

The ATUS questionnaire and coding instrument are built in Blaise, a windows-based software package developed by Statistics Netherlands and adopted as the Census Bureau standard. The software's graphical user interface (GUI) enables the usage of data entry grids that accept many entries on one screen. This feature enables the interview to be flexible, making reporting easier for respondents. It also facilitates efficient and accurate coding of diary activities.

A debit card tracking system is in place to manage incentive payments to "no-telephone-number" households in the sample.

4. Efforts to Identify Duplication

Like the 2017 Leave Module, the proposed questions will provide information about access to a broad range of types of paid and unpaid leave, recent leave activity, and workers' job flexibilities and schedules. Because the ATUS interviews people nearly every day of the year, the questions will collect data throughout the year and they will thus capture any seasonal patterns that might exist in leave activity.

Data about leave currently are available from the BLS National Compensation Survey, but these data are collected from establishments and do not include information about workers' demographic and household characteristics. Like the 2017 Leave Module, the proposed module questions will provide information about workers' access to leave from workers' perspectives and by various characteristics such as their sex, ethnicity, race, and the presence and age of children in the household. The BLS National Longitudinal Survey collects some information about leave from employed individuals, but these data are available only for specific cohorts and not the entire population. Information about flexible work schedules is available through the CPS Work Schedules and Work at Home Supplement, but the supplement has not been conducted since May 2004. The proposed Leave Module questions will collect data about leave, job flexibilities, and work schedules from a sample of individuals who are representative of the U.S. civilian noninstitutional population ages 15 and over, which is something existing surveys do not do.

5. Minimizing Burden to Small Entities

The data are collected from individuals in households; their collection does not involve any small businesses or other small entities.

6. Consequences of Less Frequent Collection

The data from the Leave Module will provide a richer description of work than is currently available, including information about the reasons for which workers are able to take paid and unpaid leave, their use of leave, and information about whether workers can adjust their schedules to balance personal and work obligations instead of taking leave. They also will shed light on how the nature of work has changed in recent years, particularly as technology has radically changed the workplace and facilitated job flexibilities for some, such as the ability to work from home. There is currently little available data on these topics. This information is important for understanding the current nature of work and how people balance work and personal needs.

Additionally, the 2017 Leave Module included several questions that were not included in the 2011 module. This includes questions about shift work, advance notice of schedules, workers' control over their schedules, flexible start and stop times, and work at home arrangements. These questions will provide an additional dimension to analyses of workers' job flexibility data.

Collecting the Leave Module again in 2018 will add significant information beyond what has been collected in 2017. An additional year of the Leave Module provides researchers with a larger sample by combining data across years. For some subpopulations, the number of observations needed to make valid statistical inferences exceeds the annual sample size.

7. Special Circumstances

In the ATUS time diary, activities are coded using a classification system not in use in any other Federal survey. A coding lexicon was developed to classify reported activities into 17 major categories, with two additional levels of detail. (ATUS coding lexicons can be found on the Internet at: [www.bls.gov/tus/lexicons.htm](http://www.bls.gov/tus/lexicons.htm)). BLS designed the ATUS lexicon by studying classification systems used for time-use surveys in other countries, drawing most heavily on the Australian time-use survey lexicon, and then determining the best way to produce analytically relevant data for the United States. The coding lexicon developed for the ATUS was extensively tested by U.S. Census Bureau coders and by coders at Westat prior to the start of full production in 2003. The development of the ATUS lexicon is described in "Developing the American Time Use Survey activity classification system," by Kristina Shelley, available at: [www.bls.gov/opub/mlr/2005/06/art1full.pdf](http://www.bls.gov/opub/mlr/2005/06/art1full.pdf).

No other special circumstances apply.

8. Federal Register Notice/Consultation Outside the Agency

- a. Five comments were received as a result of a Federal Register notice published in 82FR 31787 on July 10, 2017.

All five comments were in support of the ATUS Leave Module. One commenter noted that “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.” One comment stated that the proposed Leave Module “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... Given these changes, 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.”

*One commenter provided an additional comment about ATUS measures of time spent sleeping, noting that ATUS sleep estimates “have at times been discordant with other widely disseminated data sources including the CDC funded Behavioral Risk Factor Surveillance System (BRFSS).” This commenter recommended the ATUS differentiate reports of all time spent sleeping by major sleep period and naps.*

Research has shown that the type of question a survey uses to measure the duration of sleep can have a significant effect on the estimates produced. The ATUS uses a time diary to measure how much time a respondent spent in all activities (including sleep) on the previous day. Other sources for sleep estimates, including the BRFSS, use stylized questions that ask specifically about the amount of sleep people get “on average.” BLS staff have been studying the differences between stylized and diary sleep estimates and conclude that there are several factors that may explain the differences. However, there is likely measurement error in both diary and stylized estimates. Research suggests that that upward forces in estimates of sleep duration seem to be strongest with the diary questions, and downward forces seem to be strongest with the stylized questions. The actual duration of sleep likely falls somewhere in between.

One advantage of the time diary is that the ATUS data are publicly available and have start and stop times for all activities. Researchers can thus easily define a “regular sleeping period” and exclude sleep durations or naps that occur outside of the usual sleeping period in their analyses.

BLS will continue to research the collection of sleep activities. Further information about the sleep research BLS has conducted to date is available upon request.

*Three commenters recommended BLS add additional sets of questions to future iterations of the Leave Module regarding the variability of workers’ schedules and hours. “While the Leave Supplement currently asks respondents about their ability to vary their own schedules, and how far in advance workers know their schedules, we believe that an additional set of questions about how often their managers vary their*

*schedules and numbers of hours worked would yield important insight into job quality and flexibility.”*

As previously noted, the 2017 and proposed 2018 Leave Module include questions to capture job flexibility data, including questions about shift work, advance notice of schedules, workers’ control over their schedules, flexible start and stop times, and work at home arrangements. In the early development phase of the Leave Module, BLS considered questions to capture the fluctuation of work hours. Lambert and Hemley<sup>1</sup> recommend a series of at least two questions to capture the variability of work hours:

*In the [last month, past three months, past year], what is the greatest number of hours you worked in a week, at all paid jobs? Please consider all hours, including any extra hours, overtime, work you did at home for your job, and time you spent on work that may not have been directly billable or compensated.*

*In the [last month, past three months, past year], what is the fewest number of hours you worked in a week, at all paid jobs? Please do not include weeks in which you missed some or all hours because of illness, vacation, or other personal obligations.*

However, work hour variability is not necessarily problematic. As Lambert et al. (2014) note, some hourly part-time workers may welcome additional hours, and where long work hours are a concern, some workers may welcome the respite in fewer hours.<sup>2</sup> Thus, even more questions would be needed to understand if workers are experiencing unwanted fluctuations in the number of hours they work. In addition to determining work hour fluctuations, Reynolds (2015) recommends asking several questions to identify workers’ schedule preferences under their current circumstances in addition to their ideal number of work hours.<sup>3</sup> BLS sets a limit of five minutes on ATUS modules to limit respondent burden, and adding questions to collect information on work hour fluctuations directly would add significant time to the Leave Module.

However, some information on work hour fluctuations is already collected in the CPS and the ATUS. The CPS collects information about work hour fluctuations by asking about both usual weekly hours and the number of hours the respondent worked in the previous week, allowing “Hours Vary” as a response to the question about usual weekly hours worked. In the main section of the ATUS, employment information from the CPS

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<sup>1</sup> Lambert, Susan and Julia R. Henly. (2014) “Measuring Precarious Work Schedules.” University of Chicago.  
[https://ssascholars.uchicago.edu/sites/default/files/einet/files/managingprecariousworkschedules\\_11.11.2015.pdf](https://ssascholars.uchicago.edu/sites/default/files/einet/files/managingprecariousworkschedules_11.11.2015.pdf)

<sup>2</sup> Lambert, Susan, Fugiel, Peter J. and Julia R. Henly. (2014) “Precarious Work Schedules Among Early-Career Employees in the US: A National Snapshot.” University of Chicago.  
[https://ssascholars.uchicago.edu/sites/default/files/work-scheduling-study/files/lambert.fugiel.henly\\_precarious\\_work\\_schedules.august2014\\_0.pdf](https://ssascholars.uchicago.edu/sites/default/files/work-scheduling-study/files/lambert.fugiel.henly_precarious_work_schedules.august2014_0.pdf)

<sup>3</sup> Reynolds, Jeremy. (2015) “Work Hour Fluctuations and Work Hour Mismatches.” University of Georgia.  
[https://ssascholars.uchicago.edu/sites/default/files/einet/files/einet\\_papers\\_reynolds.pdf](https://ssascholars.uchicago.edu/sites/default/files/einet/files/einet_papers_reynolds.pdf)

is updated and respondents are asked again about the number of hours they usually work, where “Hours Vary” is again a valid response. Additional information about schedule irregularities is collected in the Leave Module. Question JF\_6 asks “What hours do you usually work?” where “an irregular schedule” is a valid response option. Question JF\_9 asks “Which days of the week do you usually work?” where “it varies” is a valid response. Analysts could use some combination of these questions as an indicator for workers with variable work hours. This information could be combined with questions in the Leave Module about how much input employees have in their schedule to determine if the number of hours worked reflects employee-driven flexibility.

*Four of the five commenters also recommended 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.*

Most of the demographic information—including sex, race, age, educational attainment, occupation, income, marital status, and the presence of children in the household—is collected in earlier CPS interviews from which the ATUS sample is drawn. The benefit of this design is that it reduces the time and burden of collecting this information again in the ATUS.

BLS and Census—recognizing the importance of high-quality labor force information on the LGBTQ population—have taken some initial steps to evaluate the feasibility of adding sexual orientation and gender identity (SOGI) questions to the CPS. In 2016, the Census Bureau sponsored the Joint Program in Survey Methodology Practicum to learn more about the fielding of SOGI questions, particularly whether proxy respondents could and were willing to provide SOGI information about household members. Results suggested that, in a voluntary online survey in which respondents receive a small monetary incentive, proxies are able and willing to provide responses.

In 2017, BLS and Census conducted a more rigorous evaluation of the feasibility of proxy responses to SOGI questions in the CPS. This evaluation included focus groups of transgender individuals that were conducted in four different cities; cognitive testing, also conducted in four different cities; and online cognitive testing. The cognitive testing included some pairs living in the same household so that self- and proxy-reported answers could be compared. As of this writing, BLS and Census are still evaluating the results; the report is scheduled to be released at the end of September. Depending upon the results and the recommendations in the report, and contingent upon the availability of funding, BLS and Census may continue to research how SOGI questions could be incorporated into the CPS. If added, SOGI information would then also be available for the core ATUS and all future ATUS module respondents.

- b. The following people have been consulted concerning the development of the survey:

Department of Labor Women's Bureau

Tiffany Boiman  
Director, Office of Policy and Programs  
Women's Bureau  
U.S. Department of Labor

Department of Labor Women's Bureau

Mark deWolf  
Economist  
Women's Bureau  
U.S. Department of Labor

U.S. Census Bureau

Beth Ashbaugh Capps  
Assistant Survey Director - American Time Use Survey  
Associate Director for Demographic Programs  
U.S. Census Bureau

Bureau of Labor Statistics

William Mockovak  
Senior Statistician  
Office of Survey Methods Research  
Bureau of Labor Statistics  
Department of Labor

9. Paying Respondents

Participants in the Leave Module will not receive compensation beyond what they already receive for participating in the ATUS. BLS offers \$40 incentives to respondents from "no-telephone-number" households only. Persons in these households do not own a phone, have not provided a phone number to the Census Bureau as of CPS month-in-sample 8 (final month), or are among a small number of households that provided Census with nonworking phone numbers. Two OMB-approved incentive expansions were implemented in recent years and, as of 2013, incentives are now sent to individuals for whom, after the first week of collection, the Census Bureau assigned call outcome codes of: *108 Number not in service*; *109 Number changed, no new number given*; *124 Number could not be completed as dialed*; and *127 Temporarily not in service*. Individuals who are sent incentives account for about 8 percent of the ATUS sample, and are more likely to be black, of Hispanic or Latino ethnicity, to have less education, and to have lower household incomes than members of households that provide phone numbers. The number of such cases is relatively small—approximately 2000 potential cases each year. Because these households may differ from phone households on unobservable characteristics, including their time-use patterns, and



because providing incentives to this small group is not cost prohibitive, BLS believes it is beneficial to expend additional effort and expense to secure their responses.

10. Assurance of Confidentiality

The Census Bureau employees hold all information that respondents provide in strict confidence in accordance with Title 13, United States Code, Section 9. (See Attachment B.) Each interviewer has taken an oath to this effect, and if convicted of disclosing any information given by the respondent may be fined up to \$250,000 and/or imprisoned up to 5 years. In addition, Title 13 prohibits Census Bureau employees from disclosing information identifying any individual(s) in the ATUS to anyone other than sworn Census employees.

Respondents are informed of their right to confidentiality under Title 13 in the ATUS advance letter, mailed approximately 10 days before the interview date. (See Attachment C.) The ATUS advance letter also advises respondents that this is a voluntary survey.

All Census Bureau security safeguards regarding the protection of data files containing confidential information against unauthorized use, including data collected through Computer Assisted Telephone Interviewing (CATI), apply to ATUS data collection.

ATUS data are securely transferred to BLS from the Census Bureau through secure servers.

11. Justification for Sensitive Questions

None of the questions in the proposed module were perceived as sensitive during cognitive testing.

12. Estimate of Respondent Burden

The estimated respondent burden for the proposed 2018 Leave Module is 458 hours. This is based on the number of eligible respondents (5,660) with a response rate of 97 percent, resulting in an estimated 5,490 responses and an average respondent burden of approximately 5 minutes.

The overall annualized dollar cost to the respondents for collection of the 2018 Leave Module is expected to be \$6,412 per year. This estimate assumes a wage rate for all respondents of \$14.00 an hour, the median hourly earnings for workers paid by the hour in 2016<sup>4</sup>.

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<sup>4</sup> The 2016 median hourly earnings are from the U.S. Bureau of Labor Statistics Current Population Survey, unpublished Table A-7: Hourly earnings of employed wage and salary workers paid hourly rates by age, sex, race, and Hispanic or Latino ethnicity and Non-Hispanic ethnicity, Annual Average 2016, page 2. See Attachment N.

Estimated Annualized Respondent Cost and Hour Burden

Total Respondents	Number of Responses per Respondent	Average Burden per Respondent (in Hours)	Total Burden Hours	Hourly Wage Rate**	Total Burden Costs
5,490	1	5/60	458	\$14.00	\$6,412

\*\*Costs are rounded to the nearest dollar and calculated using 2016 median hourly earnings (\$14.00) from the Current Population Survey.

13. Estimate of Cost Burden

- a. Capital start-up costs: \$0
- b. Total operation and maintenance and purchase of services: \$0

14. Cost to the Federal Government

The total estimated cost of the 2018 Leave Module is \$210,000. This cost is to be borne by the DOL Women’s Bureau and largely represents the charge by the Census Bureau for conducting the module. Census activities for this supplement include programming the questionnaire, developing and conducting interviewer training, collecting data, processing survey microdata, and developing public use files. The \$210,000 also includes BLS activities of data editing; developing and conducting training, documentation and public use files; call monitoring; and the administration of the interagency agreement.

15. Changes in Respondent Burden

This ICR reflects an annual burden reduction of 460 responses (from 5,950 down to 5,490) and 38 hours (from 496 down to 458) based on the number of interviews completed in the 2017 Leave Module.

16. Time Schedule for Information Collection and Publication

The proposed 2018 Leave Module will be collected for the duration of the 2018 calendar year. Processing of the module will be done as the data come in, and final data processing will be completed by mid-2019. The 2018 Leave Module public use files will be posted on the ATUS Web site at [www.bls.gov/tus](http://www.bls.gov/tus).

17. Request to Not Display Expiration Date

The Census Bureau does not wish to display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date. The advance letter sent to households by the Census Bureau contains the OMB survey control number for the ATUS.

18. Exceptions to the Certification

There are no exceptions to the certification.