

## **SUPPORTING STATEMENT A FOR WORK SCHEDULES SUPPLEMENT TO THE CURRENT POPULATION SURVEY**

### **OMB CONTROL NO. 1220-0119**

This ICR seeks to reinstate with revision the Current Population Survey Work Schedules Supplement.

#### **A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The purpose of this request for review is for the Bureau of Labor Statistics (BLS) to obtain clearance for the Work Schedule Supplement (WSS or the supplement) to the Current Population Survey (CPS), scheduled to be conducted in September 2024. This supplement was last conducted with the May 2004 CPS. The revised supplement questions are shown in Attachment A. As part of the CPS, the supplement will collect information about employed individuals ages 15 and over from a nationally representative sample of approximately 60,000 eligible U.S. households.

The results of this supplement will increase our understanding of work schedules (including shift work) and work at home for the employed by various demographic characteristics, occupations, and industries. The data are necessary for the Department of Labor and others in planning, funding, and evaluating policies and programs designed to help workers find and hold jobs. The data will expand our understanding of current workplace arrangements and how those arrangements have changed over time.

Since the supplement was last collected in 2004, work patterns and policies have changed. The disruption of the coronavirus (COVID-19) pandemic has had lasting impacts on work at home and increased the demand for information about work at home. The WSS provides information on the number and characteristics of people who work at home, including people who operate businesses from their homes. It includes items about the frequency of work at home and makes it easier to identify people who work entirely at home, a topic of interest for researchers and policy makers. For those who work entirely at home, there are new questions about whether they have a worksite they could go to and why they don't work there.

As work at home is more common than in the past, there is a need to have more information about the nature of this work, including identifying people who work entirely at home and quantifying how much people work at home. Policy makers lack information about hybrid work (combining at-home and on-site work) from a large-scale comprehensive labor force survey. For

people who work at home some of the time, the supplement asks about hours and days of the week worked at home, including days worked exclusively at home. These items will shed light on the intensity of work at home. There are also questions about work at home on second jobs.

In terms of work schedules, the supplement includes questions to identify shift workers and the reason people work a non-daytime shift. Other questions ask whether people can vary their work hours (the time they start and end work), days worked, or shift worked. Other questions ask about how many and which days of the week people work (including items about second jobs). The 2024 supplement also includes a question about how far in advance workers know their work schedule. Researchers and policy makers can use these data to identify people who lack advance notice of their work schedule or may have unstable work schedules.

The CPS has been the principal source of the official Government statistics on employment and unemployment for over 75 years. Collection of labor force data through the CPS helps BLS meet its mandate as set forth in Title 29, United States Code, Sections 1 through 9 (Attachment B).

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

This supplement will gather information on work schedules and work at home of the employed. Information will be collected to broadly categorize work schedules, including identifying shift workers and workers with flexible schedules, and people who work at home, including those who work entirely at home. The 2024 WSS will allow researchers and policy makers to evaluate how the number and characteristics of shift workers and people who work at home has evolved. Policy makers also can use these data to inform the design of regulations for different types of workers.

Because this supplement is part of the CPS, in which detailed demographic data are collected, estimates can be produced for a variety of population groups. Given sufficient sample size, comparisons will be possible across demographic characteristics such as sex, age, race, Hispanic or Latino ethnicity, and educational attainment. Comparisons by class of worker, industry, and occupation will also be possible.

BLS has conducted supplements on work schedules since the 1970s. The first supplement to collect data on home-based work was conducted in 1985. Work schedules supplements with questions about home-based work were again conducted in May 1991, 1997, 2001, and 2004, although changes to the questionnaire mean results from the initial supplements generally were not comparable with results from later supplemental surveys. An important purpose of the September 2024 supplement is to provide updated information that will be useful in gauging the growth and nature of work at home and changes in work schedules over time.

BLS published a summary of the findings from the May 2004 collection in two news releases: one on [workers on flexible and shift schedules](#) issued in July 2005 and one on [work at home](#) issued in September 2005 (Attachments C and D).

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The Census Bureau, which conducts the actual collection of the CPS data—designing the sample, training and monitoring the interviewers, and conducting a continuing quality control program—uses methods designed to keep respondent burden as low as possible. These interviewing methods, which include the use of computer-assisted interviewing, were improved as part of a complete redesign of the CPS implemented in January 1994. The redesign was preceded by years of wide-ranging discussions, research, and large-scale field tests aimed at long-range improvements in the survey.

The CPS and all of its supplements are collected 100 percent electronically by using Computer Assisted Telephone Interviews and Computer Assisted Personal Interviews (CATI/CAPI). With the collection of Basic CPS data for January 2007, an updated computer-assisted interviewing software, called Blaise, was introduced for running the data collection instrument. Blaise is a Windows-based survey processing system developed by Statistics Netherlands and licensed by Westat in the United States. The questions in the proposed supplement were designed to obtain the required information with minimal respondent burden.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.**

There are no Federal surveys that provide comparable detailed information on work schedules or work at home in the context of a large labor market survey. Several surveys gather data on certain aspects of work schedules and limited information on work at home.

The basic monthly CPS includes two questions on telework or work at home by employed people who worked during the survey reference week: one on incidence, and one on hours per week. The additional questions in the work schedules supplement will add valuable detail about work at home that is unavailable in the monthly CPS, including frequency of work at home, the ability to work at home, and the reason people do or do not work at home. The supplement also asks about work at home on second jobs.

Two simple questions on work schedules were included in the July 2023 Contingent Worker Supplement (CWS). One CWS question about advance notice of work schedule is also included

in the WSS to allow researchers to monitor changes over time. This advance notice information will also be valuable in conjunction with the other items asked in the WSS about days worked, shift work, and different ways workers might be able to change their work schedules.

The American Time Use Survey (ATUS) collects information about work at home as part of its data on how (and where) people spend their time. However, the limited sample of the ATUS restricts the comparisons that can be made for different types of workers. Periodic supplemental modules to the ATUS have collected information about access to leave and job flexibilities. These supplemental modules include additional questions on work schedules that were initially adapted from the CPS WSS. The ATUS module is only collected from wage and salary workers and excludes all self-employed people. Again, the smaller sample of the ATUS limits the tabulations that can be made with these data. The CPS WSS includes additional detail that is not captured in the ATUS modules. The CPS supplement includes the self-employed. The larger sample of the CPS enables comparisons across more characteristics for different types of workers than are available from the ATUS module.

Some of the WSS questions are the same or similar to those collected in the 2024 ATUS Leave and Job Flexibilities Module. Because the ATUS samples from households completing their final month of interviews for the CPS, a small number of CPS WSS respondents may be asked the same or similar questions about job flexibilities and work schedules in the ATUS November and December 2024 interviews. BLS estimates a maximum of 160 respondents would be asked both the CPS Work Supplement and the ATUS Leave and Job Flexibilities Module questions in 2024. The ATUS is exploring an extension of the Leave and Job Flexibilities Module into 2025, which would expand the number of potential WSS respondents that would receive the ATUS Leave and Job Flexibilities Module questions.

BLS recognizes that minimizing respondent burden and duplication and maximizing the utility of collections is a statutory requirement of agencies put in place by Congress in the Paperwork Reduction Act of 1995 (PRA). BLS carefully considered several options to reduce respondent burden associated with duplicative questions. BLS sought to minimize respondent burden associated with duplicative questions by decreasing the number of respondents who would receive both the WSS and the Leave and Job Flexibilities Module questions. The CPS first planned to field the WSS in May 2024. CPS moved the planned supplement to September to reduce overlap with the 2024 ATUS Leave Module. Because individuals are interviewed for the ATUS 2-5 months after their final CPS interview and the ATUS Leave Module is scheduled through December 2024, fewer people would be asked both the CPS WSS and the ATUS Leave Module questions. While BLS would prefer they were timed differently so they did not overlap at all, both the ATUS and CPS have limited openings for the fielding of supplements and modules.

BLS feels there are benefits to asking some of the same questions on both the WSS and the Leave Module. There is no reason to believe that work schedules and work at home behavior is fixed over time. For example, people's work schedules may be subject to seasonal or other changes even if they have the same job in both surveys. CPS will ask the WSS questions about all eligible persons in the household, allowing proxy respondents, whereas the ATUS does not

allow proxy respondents. For all these reasons, we expect that response to a WSS question and a Leave Module question on the same topic may differ in some instances. Asking the questions in both surveys is beneficial, and analyses of the data from both surveys also could yield insight about how stable answers are over time. The presence of similar items in both surveys may open a potential avenue for research on how an individual's work schedule and work at home may change over time, both for those in the same employment and those who change jobs. There is considerable interest in how work schedule and work at home flexibility affects job choice and the decision to change jobs.

The National Longitudinal Surveys (NLS) conducted by BLS have included questions on work at home, but the surveys cover only limited age cohorts, whereas the CPS looks at the entire working-age population.

The Census Bureau has programs that collect limited data related to work at home. For example, American Community Survey (ACS) furnishes limited data on work at home from a commuting ("journey to work") question. Because the survey is very large, the ACS provides data by state and many local areas. However, the ACS does not provide any information about the extent or intensity of work at home. The Survey of Income and Program Participation (SIPP) includes a fairly comprehensive set of questions on work schedules, which has been augmented with commuting-based questions to identify work at home. The Household Pulse Survey typically includes a question about telework or work at home but has limited information about employment and other work characteristics.

The National Household Travel Survey (NHTS), which is sponsored by the Department of Transportation, has limited information on home-based workers, primarily related to identifying the impact of work at home travel.

A common limitation shared by most of the above programs is that none offers a broad view of work schedules or work at home within the context of the U.S. labor market with the rich detail available from the CPS.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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

**6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The Work Schedules Supplement should be repeated in September 2024 to provide more current information on work schedules and on work at home and to provide a point of comparison with

the data from May 2004. The disruption of the coronavirus (COVID-19) pandemic has had lasting impacts on work at home and increased the demand for information about work at home. Monthly questions from the CPS provide some information about telework, but lack comprehensive information on the frequency of work at home, hybrid schedules, and other characteristics of work at home. This supplement will provide the data to allow us to answer the many questions that surround work at home, as well as data used to track changing work schedule patterns, including shift work. This information—in combination with information collected in the monthly CPS, such as demographic and labor force characteristics—will help guide law makers to determine if new policies or regulations are needed for people who work at home.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentially to the extent permitted by law.**

There are no special circumstances. The CPS data are collected in a manner that is consistent with the guidelines in 5 CFR 1320.5.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public**

**comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

#### Federal Register Notice

Two comments were received as a result of the Federal Register notice published in 89 FR 20502, on March 22, 2024.

The first comment, which was emailed on March 23, 2024, expressed the opinion that there is no need for this survey. The mission of the BLS is to provide relevant information on economic and social issues. This particular information collection aims to allow researchers and policy makers to evaluate how the number and characteristics of shift workers and people who work at home has evolved. Policy makers also can use these data to inform the design of regulations for different types of workers. The remainder of the comment was out of scope.

The second comment, which was emailed on May 21, 2024, expressed support for the collection of these data and the value of the information (benefitting other federal agencies and enabling independent research) and suggested collection of these data should be regular and ongoing. The comment also suggested additional questions on topics including overtime, guaranteed minimum hours of work, work off the clock, work hours and access to benefits, prevalence and ease-of use of online scheduling and time-tracking systems, and alternative work arrangements. It also suggested that several questions should allow a “choose multiple” or “choose all” response.

BLS appreciates the support for the collection of these data and the value of the information in the WSS. Contingent on funding, we hope to make collection of the WSS more routine in the future.

BLS understands the desire to capture additional information related to work schedules and work at home, but must balance the limited resources available for a CPS supplement like the WSS. Supplemental surveys face a time limit (under 10 minutes per household) and questions must be able to be answered by a proxy respondent. (About half of the responses in the CPS are provided by proxy—one household member responding on

behalf of other people in the household.) For example, it is unclear that a proxy respondent would be knowledgeable enough to answer questions about the use of online scheduling and time-tracking systems for other people in the household.

Adding additional questions on new topic areas would probably require removing other questions (or eliminating some of the new additions). One of the reasons the question on overtime was eliminated was to make room for new questions about advanced notice of work schedules and questions for people who work entirely at home. Broaching questions about benefits like health insurance would require the addition of many questions and introduce another topic area. Additionally, proxy respondents may not be familiar with the details of benefits plans for other household members.

BLS considered the suggestion about allowing a “choose all” option that would capture all shifts worked at least weekly. This is a significant change to a fundamental concept in the survey and would need considerable study. The main item identifying shifts (non-daytime schedules) asks about “usual” work schedules, not bound to the survey reference week or the new “at least weekly” concept raised in the comments. This would represent a significant break in comparability with past data on the subject, a key goal in the collection of the WSS data. The concept of “usual” work is used throughout the basic CPS labor force survey and the work schedules supplement, for example asking about usual hours worked per week in the basic CPS and usual days of the week, usual days per week, and usual hours worked at home in the WSS. Introducing a new time reference for one topic would be complicated for respondents. It also would require considerable restructuring of the work schedules questions. Such changes need extensive testing and could not be implemented in time for collection in 2024. The existing question does include categories for people that work multiple non-daylight shifts; a rotating shift and an irregular schedule have been response options for many years. The share of full-time wage and salary workers in rotating and irregular shifts tends to be smaller than those reporting evening and night shifts.

BLS considered the suggestion about allowing a “choose all” option for the reason questions, such as reason for working a specific schedule/shift, reason for working (or not working) at home, and reason for working more than one job. The reason items are not multiple-choice questions; the responses available to the interviewer are not read or visible to respondents. The questions ask about “main” reason, which is typical in the CPS and other CPS supplements, and the first, unprompted answer from the respondent is recorded by the interviewer. Probing to gather additional responses or reading and recording additional responses would take more time and require the elimination of other questions. The added value of additional responses is unclear, particularly relative to removing other questions. These reason questions are also challenging for proxy respondents to answer.

BLS considered the suggestion about adding questions about alternative work arrangements like those identified in the Contingent Worker Supplement (CWS). BLS subject matter experts agree that it would be very interesting to see the interaction

between work schedules, work at home, and alternative work arrangements. However, the work arrangements identified in the CWS already constitute their own extensive supplement and cannot be combined with the WSS in the time available for a CPS supplement. Most of the CWS concepts, like digital platform work, require a series of questions, not just a single one, which inhibits our ability to combine it with other in-depth topics like work schedules or work at home. The CWS does include two items that relate to work schedules (advance notice of schedule and control of schedule) that will be available to users of the CWS data. Also, a question in the basic CPS monthly labor force survey asks about telework or work at home for pay that can be evaluated with the CWS estimates of alternative work arrangements.

The following people have been in consultation with BLS concerning the development of the survey:

#### Outside Consultation

Bureau of the Census  
Kyra Linse  
Associate Director Demographic Programs  
Bureau of the Census  
Department of Commerce  
(301) 763-9280

In addition to the above, a statement soliciting comments for improving CPS data is prominently placed in all Census Bureau publications that cite CPS data. A similar statement is included in the technical documentation that accompanies the microdata files. Also, the CPS advance letter (Attachments E and F) provides respondents with an address at the Census Bureau to which they can submit general comments on the survey, specifically those regarding respondent burden.

#### **9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.**

The Census Bureau does not make any payments or provide any gifts to individuals participating in the CPS.

#### **10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Census Bureau will collect the supplement data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household will receive an advance letter (Attachments E and F) approximately one week before the start of the initial CPS interview. The letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Field representatives must

ask each respondent if he/she received the advance letter and, if not, must provide a copy of the letter to each respondent and allow sufficient time for him/her to read the contents.

Also, interviewers provide households with the pamphlet "The U.S. Census Bureau Respects Your Privacy and Protects Your Personal Information" (Attachment G), which further states the confidentiality assurances associated with this data collection effort.

All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9 (Attachment H). Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if they disclose any information given to them.

As is the case with all CPS data collection, data released to the public by BLS or Census in tabular form or as microdata files are released in compliance with Title 13. Tabular data released to the public are always in aggregated form. No tabulations that allow for the identification of individual respondents are made available to the public. Any microdata files that are released are public use files with all identifying information removed from the records.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No sensitive questions are asked in this supplement.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection**

**activities should not be included here. Instead, this cost should be included in Item 14.**

The estimated respondent burden for the September 2024 Work Schedules Supplement is 3,917 hours. This is based on an average respondent burden of approximately 5 minutes for each of the approximately 47,000 respondents that will be interviewed in the supplement. Generally, one respondent answers for the household. The actual respondent burden is dependent upon the size of the household and the characteristics of its occupants.

The overall annualized dollar cost to the respondents for collection of the supplement data is \$75,363. This estimate assumes a wage rate for all respondents of \$19.24 an hour, the median hourly earnings for workers paid by the hour in 2023.

**Estimated Annualized Respondent Cost and Hour Burden**

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate*	Total Burden Cost
Work Schedules Supplement	47,000	1	47,000	5 min or 5/60 hour	3,917	\$19.24	\$75,363

\* [Median hourly earnings](#), annual average 2023.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

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

There are no costs to survey respondents other than the time it takes to respond to the questionnaire. Respondents answer questions based on personal experience, which requires no record-keeping or other expenses.

**14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.**

The total estimated cost of the September 2024 supplement is approximately \$1,000,000. This cost is borne by the Bureau of Labor Statistics and largely represents the charge by the Census Bureau for conducting the supplement. Census activities for this supplement are approximately 90 percent of the cost and include programming the collection instrument, developing interviewer training materials, collecting data, processing survey microdata, and developing public use files. The remaining costs are for the BLS staff to prepare a news release and publish estimates, as well as develop specifications, test the collection instrument, and evaluate data quality.

**15. Explain the reasons for any program changes or adjustments.**

This is a reinstatement with change of a previously approved collection. The supplement is administered to households in which there is an employed person. Total respondent burden for the collection of the 2024 WSS is estimated to be 3,917 hours, slightly lower than the previously approved collection. In 2024, the number of eligible persons per month is approximately 47,000, down from earlier collections.

**16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The September 2024 CPS, of which this supplement is a part, will be conducted from September 15-24, 2024. Processing of this supplement will begin the month following the collection. Survey results will appear as news releases in 2025. The news releases will be published on the BLS website at [www.bls.gov/cps](http://www.bls.gov/cps).

Additionally, the Census Bureau will release a public use version of the microdata after the publication of the news releases.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Census Bureau does not wish to display the assigned expiration date of the information collection because the data collection instrument is automated and, therefore, the respondent would never see the date. The advance letter sent to households by the Census Bureau contains Census's OMB clearance number for the CPS and Census's version of the failure to comply notice (Attachments E and F). Copies of this advance letter are stockpiled by the Census Bureau for use as needed; changes to the letter would make the current inventory of letters unusable.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification.