

April 27, 2015

Ms. Angela Adams
U.S. Department of Labor
Women's Bureau
200 Constitution Avenue, NW
Frances Perkins Bldg.,
Washington, DC 20210

Re: Proposed Information Collection; Collection Request (ICR) for the Survey of Working Women; Comment Request (Document Citation: 80 FR 10516)

Dear Ms. Adams:

We appreciate the opportunity to respond to the proposed information collection published by the Department of Labor (the Department) on the 2015 Survey of Working Women. The National Women's Law Center (the Center) has worked to advance opportunities for women in employment and been a leader in analysis and advocacy to promote policies that improve the lives of women and their families for over 40 years. The Center's comments will focus on the value of collecting information on women's employment decisions and issues at the intersection of work and family obligations.

The Center is pleased to see the Department undertaking additional data collection on women's current employment challenges and how these issues, particularly women's family obligations, relate to their job and career decisions. Increasing data collection on these topics is a critical part of understanding how family obligations impact women's employment decisions and substantially improves the amount and quality of information available to employers, advocates, and other stakeholders.

Since the Department of Labor's Women's Bureau published the *Working Women Count!* Survey in 1994, there have been significant changes to both the economy and family life in the United States. These changes, including the Great Recessionⁱ and subsequent increase in low-wage workers,ⁱⁱ and the rise of women as breadwinners,ⁱⁱⁱ have affected women's roles in the family and the workforce. However, there is a dearth of current data regarding women's employment decisions, leaving policymakers without the information necessary to create the best policies to address the issues facing women in the workforce today.

Expanding the available data on women's employment choices—and how these choices might be affected by issues such as the affordability of child care, scheduling practices, sexual harassment, ability to enter non-traditional jobs, availability of paid sick leave, or stagnant or discriminatory wages—is essential for better policy creation. Collecting high-quality data on these and other issues will create a valuable resource for policymakers, employers, advocates, and other stakeholders who are concerned with ensuring that women are able to pursue their desired work and family arrangements.

Additionally important is that the factors affecting employment decisions may vary for different groups of women depending on age, gender identity, race, national origin, education level, marital or parental status, or other reasons. The Center encourages the Department to examine work and family interactions across a range of different groups of women.

The Center supports the Department's effort to collect data on women and their perceptions about the intersection of work and family. With the relevant data, policymakers can create better policies that protect all women and their families from unfair treatment in the workplace. Lacking this data, employers, researchers, and advocates are without key information for analysis of women's employment choices.

The Center appreciates this opportunity to comment.

Sincerely,



Fatima Goss Graves
Vice President, Education & Employment



Katherine Gallagher Robbins
Director of Research & Policy Analysis

ⁱ National Women's Law Center, Fourth Anniversary of the Recovery Shows Job Gains for Women—But a Long Road to a Full Recovery (July 2013) *available at* <http://www.nwlc.org/resource/fourth-anniversary-recovery-shows-job-gains-women%E2%80%9494-long-road-full-recovery>.

ⁱⁱ National Women's Law Center, Underpaid & Overloaded: Women in Low-Wage Jobs (July 2014) *available at* <http://www.nwlc.org/resource/underpaid-overloaded-women-low-wage-jobs>.

ⁱⁱⁱ Center for American Progress, Breadwinning Mothers, Then and Now (June 2014) *available at* <https://cdn.americanprogress.org/wp-content/uploads/2014/06/Glynn-Breadwinners-report-FINAL.pdf>.