

February 22, 2005

Amy A. Hobby, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics
2 Massachusetts Ave., NE, Room 4080
Washington, DC 20212

Re: Comments on Proposed Discontinuation of Current Employment Statistics Women Worker Series

Dear Ms. Hobby:

On behalf of the National Coalition for Women and Girls in Education (NCWGE), a coalition of more than 50 organizations committed to gender equity in educational activities, we write to oppose the proposal of the Bureau of Labor Statistics (BLS) to eliminate collection of the Current Employment Statistics Women Worker Series (CES WWS). The CES WWS is an important and unique source of information about how women are faring in the economy, and offers a piece of the economic picture which it is critical to maintain. This is because, despite significant gains by women in the workforce over the last few decades, women have not yet achieved equality with men in the workplace, and women and men continue to have different experiences with, and relationships to, employment. Women still earn only about three-fourths of what similarly situated men earn; women still take more time out of the workforce than men to care for family members and are more likely to work part-time; and the workforce is still highly sex-segregated, with women concentrated in different and lower-paying jobs and industries than men.¹ Because women and men often predominate in different industries, they can also have different experiences with job gains and losses over the course of economic downturns and recoveries.

The elimination of the CES WWS necessarily would produce a less complete, and therefore possibly misleading, view of how female and male workers are affected by the business cycle, which in turn has implications for public policy. It is important to know whether and where women are losing jobs, and how that might differ from men's experience, to help ensure both that economic trends that affect the sexes differently are identified and examined and that

¹ Bureau of Labor Statistics, U.S. Dept. of Labor, *Women in the Labor Force: A Databook*, 14, 25-34, 38-39, 48-50 (Feb. 2004), available at <http://www.bls.gov/cps/wlf-databook.pdf> (last visited Feb. 1, 2005).

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industries in which women have incurred disproportionate job losses are not overlooked in decisions about, for example, job training and displacement assistance.

Moreover, the information provided by the CES WWS cannot be replaced by the Current Population Survey (CPS). The CPS collects household data from a sample size of only 60,000,² whereas the CES collects establishment data from actual business records submitted by between approximately 160,000³-283,000⁴ employers, representing 400,000 workers.⁵ The CPS provides information on the employment status of people, whereas the CES provides information on the presence or absence of jobs. The CES is “widely viewed as a key measure of the health of the economy...” and its estimates are “some of the most timely and sensitive economic indicators published by the Federal Government.”⁶ Despite the promise of a new CPS table on employed women by industry, as indicated in the revised and expanded January 31, 2005 version of BLS’ Notice,⁷ the basic fact is that the CPS and the CES convey different, albeit related, information about women and employment.

Finally, the justifications offered by the BLS to discontinue the WWS do not outweigh the benefits of collection of the information. The BLS states, for example, that the “data series does not have a large number of users”⁸ and is “little used.”⁹ But nothing in the BLS Notice defines what constitutes a “request” for the data, and it appears that BLS may be using an unduly narrow definition that fails to account for the myriad ways in which this information is consumed [See Comment Letter of the Leadership Conference for Civil Rights (submitted to the BLS Feb. 22, 2005)]. Moreover, even assuming the number of “users” has been relatively low, the reason may be simply that the BLS has failed to make the data readily visible or accessible. *Id.* Finally, even if there have been relatively few “requests” for the WWS, that is evidence only that too many requesters are glossing over possible differences between women and men, not evidence that the information is not needed.

The facts also belie the BLS’ view that the CES WWS “imposes a significant reporting

² Bureau of Labor Statistics, U.S. Dept. of Labor, Labor Force Statistics from the Current Population Survey: Overview, available at http://www.bls.gov/cps/cps_over.htm#available (last visited Feb. 3, 2005).

³ Bureau of Labor Statistics, U.S. Dept. of Labor, Planned Changes to the Current Employment Survey, available at <http://www.bls.gov/ces/cesww.htm> (modified Jan. 31, 2005) [hereinafter Revised Notice].

⁴ Proposed Collection, Comment Request, 69 Fed. Reg. 76793 (proposed Dec. 22, 2004) (hereinafter Fed. Reg. Notice).

⁵ Revised Notice, *supra* note 4.

⁶ Chris Manning, *Concurrent Seasonal Adjustment for National CES Survey*, 126 Monthly Labor Review 39 (Oct. 2003).

⁷ Revised Notice, *supra* note 4, at 1.

⁸ Fed. Reg. Notice, *supra* note 5, at 76794.

⁹ Revised Notice, *supra* note 4.

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burden”¹⁰ on employers. On the very forms used to collect the gender information from employers, BLS estimates that it takes an average of only seven minutes to fill out the *entire* form each month.¹¹ In fact, the WWS is based on only a single question on that form: “Enter the number of employees from Column 1 who are women.”¹² The BLS has not provided evidence of the actual, demonstrated burden of answering this one question; nor has it offered any evidence of the percentage of employers that are already collecting this information. But certainly, those with 100 or more employees already capture and report this and more extensive information on their EEO-1 forms.¹³ Federal contractors must also track the sex of their employees as part of their various reporting obligations. Smaller employers presumably have little trouble identifying and reporting the sex of their employees. As a result, it is difficult to believe that it is burdensome for employers to continue reporting this information.

For the foregoing reasons, the NCWGE urges the BLS to continue the Women Worker Series of the Current Employment Statistics.

Sincerely,



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American Association of University Women
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¹⁰ Revised Notice, *supra* note 4.

¹¹ See, e.g., Bureau of Labor Statistics, U.S. Dept. of Labor, Bureau of Labor Statistics Report on Current Employment Statistics – Service-Providing 1, Form # BLS-790 E, available at <http://www.bls.gov/ces/bls790e.pdf> (last visited Feb. 3, 2005).

¹² *Id.*

¹³ See 29 C.F.R. §§ 1602.7-1602.14 (2004); U.S. Equal Employment Opportunity Commission & Office of Federal Contract Compliance Programs, Equal Employment Opportunity Employer Information Report EEO-1, at 2, available at <http://www.eeoc.gov/eeo1survey/eeo1.pdf> (last visited Feb. 7, 2005).