



INSTITUTE FOR WOMEN'S POLICY RESEARCH
1707 L Street NW, Suite 750 ♦ Washington, DC 20036

May 17, 2005

Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for the Bureau of Labor Statistics (BLS)
Office of Management and Budget
Room 10235
Washington, DC 20503

To Whom It May Concern:

On behalf of the Institute for Women's Policy Research, I am writing to formally object to the Bureau of Labor Statistics' proposed elimination of the Women Workers Series (WWS) of the Current Employment Statistics (CES) survey. We sincerely hope that the BLS will recognize the importance of these data for understanding women's economic situation and will opt to continue the series on a three-year trial basis.

In expressing our opposition to this change, we join over 30 organizations, 30 U.S. Senators, 62 members of Congress, and thousands of individuals from across the United States who submitted comments opposing this change during the initial BLS comment period.

The BLS proposal asserts that eliminating the question on women workers will reduce the burden on employers in answering the survey. However, the BLS has offered no estimate of the time or money burden of this question. We understand that the BLS has conducted some field testing of the survey, and these data could be used to estimate the burden of the women workers question if collection of the WWS data were continued for a three-year trial period. The BLS has also argued that the women worker data are infrequently used. We concur with the New York Federal Reserve Bank's suggestion that the underutilization of this survey is due to a lack of knowledge and access, rather than lack of interest. We recommend that the BLS continue the series on a three-year trial period, during which the BLS could publicize the series and measure changes in usage.

The CES data provide the most accurate picture of where women are gaining or losing jobs, in response to economic restructuring, changes in the business cycle, variation in labor supply, or other factors. As we all know, women and men generally work in very different places in the labor market; sex segregation by industry and occupation is a persistent feature of U.S. employment. Employment losses and gains over the course of a recession and recovery vary tremendously by industry, leading to unpredictable differences between women's and men's experiences over the business cycle and in response to structural economic change. Since the recent recession, the WWS data show that women's employment recovery is differing substantially from men's. In fact, while women's employment returned to pre-recession levels in May 2004, men's employment still has not recovered after 48 months. If these data were combined, as the BLS is proposing, it would appear that the employment of all workers recovered by January 2005. Without accurate, timely data, we may develop misleading pictures of employment changes for both men and women and institute ineffective policy solutions.

Contrary to the BLS's statement, Current Population Survey (CPS) data do not provide a substitute for these CES data. While CPS data, which are collected from households, are useful for other purposes, the larger CES dataset, collected from establishments, is regarded as the most reliable when measuring month-to-month changes in employment. As BLS Commissioner Kathleen Utgoff stated on September 5, 2003, "It is our judgment that the payroll survey provides more reliable information on the current trend in wage and salary employment."¹

Currently, the Institute for Women's Policy Research uses the establishment data on women workers in a number of our research areas. In our latest Briefing Paper on women's economic status (available online at <http://www.iwpr.org/pdf/B245.pdf>), the establishment data proved invaluable for analyzing women's job losses and gains by industry before and since the 2001 recession. In fact, IWPR's briefing paper showed that the 2001 recession initiated the first sustained period of decreased employment for women in 40 years.

Using this data set, researchers at the New York Federal Reserve Bank recently found that women behaved differently in the most recent recession than in previous ones and that women's labor force participation declined for the first time, in conjunction with their loss of jobs during the recession. The Bank argues that just when women's employment patterns are changing is exactly the wrong time to discontinue this unique and lengthy dataset. While CPS data are only available since 1989, the CES can be used for historical comparisons, because data on women workers are available from 1964.

The Current Employment Statistics data on women's employment are a critical source of information about women's economic status. In our view, it is essential that collection of data on women and men separately be continued. We recommend continuing to collect these data over a three-year trial period, during which the visibility of the series should be increased.

Cordially,

Heidi Hartmann, Ph.D.
President, IWPR, and
Research Professor
The George Washington University

¹ Kathleen P. Utgoff, "Commissioner's Statement on the Employment Situation." U.S. Department of Labor, Bureau of Labor Statistics. September 5, 2003. Available online at: http://www.bls.gov/news.release/archives/jec_09052003.pdf.