

August 6, 2021

Honorable Martin J. Walsh
Secretary
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20224

**RE: EFFECTIVE JOBS RECOVERY REQUIRES REGULAR NONPROFIT
EMPLOYMENT AND WAGE DATA**

Dear Secretary Walsh:

We, the undersigned nonprofit organizations and scholars, appreciate the opportunity to comment on the FY 2022—2026 Draft Department of Labor (DOL) Strategic Plan and Evidence-Building Plan. We commend DOL's efforts to promote gold-standard statistics and analyses, and to be a department grounded in "evidence, innovation, and employee engagement." In addition to commenting on proposed Goal 4 of the Strategic Plan—producing gold-standard statistics—our comments pertain to *all* of the Evidence-Building Plan's Priority Learning Areas, especially Learning Area 1: Equity in Employment and Training Programs; Learning Area 3: Studying Effects of the Covid-19 Pandemic; and Learning Area 5: Strengthening Unemployment to Reemployment.

We write to alert you to critical data and evidence gaps that we hope will be corrected as a result of the DOL's strategic and evidence-building planning: data on the nonprofit sector, the country's third largest industry in terms of jobs. Given the sector's central role in so many aspects of American life and its position as the third largest private employer in the United States, it is essential that the U.S. government collect and report regular, accurate, and accessible data on nonprofit employment and wage trends. We, therefore, request that the Department of Labor direct the Bureau of Labor Statistics (BLS) to provide quarterly data on nonprofit employment and wages through its Quarterly Census of Employment and Wages (QCEW). These data should be provided nationally, by state, county, and metropolitan area, and broken down by field and major subfields.

Nonprofits are essential partners to government, serving on the frontlines of COVID-19 relief and economic recovery efforts. From healthcare to housing, houses of worship to human services, education to environmental protection, and more, governments at all levels rely on charitable nonprofits to generate innovative solutions and provide critical services throughout the country. Employing the third largest workforce of any U.S. industry, the nonprofit sector is also a major job creator and component of local economies, outdistancing all branches of manufacturing, all construction, and all finance and insurance. Despite its position as a leading source of jobs, this fact is largely unknown, due in no small part to the lack of timely information from the DOL.

The mission of the BLS includes a duty to "measure labor market activity, working conditions, price changes, and productivity in the U.S. economy to support public and private decision

making.” While BLS staff have made important efforts, a great disparity in available data prevails. It is fundamentally unfair for the BLS to give regular quarterly workforce data to industries like goat farming and limousine service, while the nonprofit sector—representing more than 10% of the nation’s private workforce—is required to either purchase this information or wait years for it. The lack of timely and accurate data threatens the health and wellbeing of tens of millions of people who rely on nonprofits for services because the absence of this information means policymakers must guess at the potential impact of legislative and regulatory proposals, or overlook nonprofits entirely.

The global economic and public health crisis caused by COVID-19 underscored and amplified the need for regular nonprofit employment information. Like other sectors, nonprofit finances were devastated, and at one point, nonprofits were estimated to have lost over 1.6 million jobs. In fact, nonprofit job losses are occurring at a time of skyrocketing need and depleted resources in our communities. Thus, the nonprofit industry has been hit hard by dramatic swings in revenue, costs, and employment. Unlike for other industries, however, the BLS does not release regular data for the nonprofit industry that could help policymakers make informed decisions.

Researchers from Johns Hopkins Center for Civil Society Studies are making every effort to provide regular estimates of the impact of these crises on the nonprofit workforce, using uncertain projections from 2017 data. It would be far more effective, efficient, and accurate if projections could be based on more recent BLS data, or if BLS itself could directly release data about nonprofit job loss and recovery alongside other industries. Lacking adequate official data from BLS, nonprofits were forced at the height of the pandemic to divert significant resources to gathering replacement data, and relief legislation was less effective as a result. Scholars and others in the nonprofit sector, who have worked with BLS in the past, stand ready to help BLS accomplish these goals, particularly as they pertain to filling in data gaps since 2017.

In conclusion, the lack of timely and accurate data on the country’s third largest private sector employer hampers job recovery efforts, leaves a significant portion of U.S. employers and employees in the dark, and hurts the public. It is essential that the U.S. government release accurate and accessible data on nonprofit employment and wage trends on a quarterly basis, on par with other major industries in the country. Such data should be provided nationally, by state, county, and metropolitan area, and broken down by field and major subfields consistent with privacy requirements.

Sincerely,

1. Alliance for Strong Families and Communities and Council on Accreditation
2. American Alliance of Museums
3. American Association for State and Local History
4. American Heart Association
5. Americans for the Arts
6. Aspen Institute’s Program on Philanthropy and Social Innovation
7. Association of Art Museum Directors

8. Association of Fundraising Professionals
9. Association of Performing Arts Professionals (APAP)
10. Association of Science Museum Directors
11. Association of Tax-Exempt Startups & Entrepreneurs (ATESE)
12. Association pour le développement des données sur l'économie sociale (ADDES)
13. Bayer Center for Nonprofit Management at Robert Morris University
14. Big Brothers Big Sisters of America
15. BoardSource
16. Boys & Girls Clubs of America
17. Candid
18. The Caregiver Foundation
19. Catholic Charities USA
20. Center for Non-Profits (NJ)
21. Center for Nonprofit Excellence (VA)
22. Charity Navigator
23. Child Welfare League of America
24. Colorado Nonprofit Association
25. Community Learning Partnership
26. Community Resource Center
27. Community Wealth Builders
28. Council on Foundations
29. Dana Hagenbuch Search
30. Dance/USA
31. data.world
32. Delaware Alliance for Nonprofit Advancement
33. Do Good Institute - University of Maryland, College Park
34. Donkey Bridge Consulting
35. Fair Chance
36. Florida Nonprofit Alliance
37. Foster Guardian Inc.
38. Fund the People
39. Georgetown University's Center for Public and Nonprofit Leadership
40. Georgia Center for Nonprofits
41. Girl Scouts of the USA
42. Girls Inc.
43. Goodwill Industries International, Inc.
44. Habitat for Humanity International
45. Hale Kipa, Inc
46. Hawaii Alliance of Nonprofit Organizations
47. Hawaii Habitat for Humanity Association
48. The Henry Ford
49. Idaho Nonprofit Center
50. Independent Sector
51. Janus Youth Programs
52. Jewish Federations of North America
53. Jobs That Help

54. Johns Hopkins Center for Civil Society Studies
55. KaBOOM!
56. Kansas Nonprofit Chamber
57. The Kendal Corporation
58. Kentucky Nonprofit Network
59. Ku'ikahi Mediation Center
60. Leadership 18
61. League of American Orchestras
62. League of United Latin American Citizens (LULAC)
63. The Learners Lab Foundation (TLLF)
64. Lutheran Services in America
65. Marion County Commission on Youth, Inc.
66. Maryland Nonprofits
67. Maryland Philanthropy Network
68. Massachusetts Nonprofit Network
69. Mental Health America
70. Mental Health America of Hawai'i
71. MENTOR
72. Michigan Nonprofit Association
73. Minnesota Council of Nonprofits
74. Momentum Nonprofit Partners
75. National Association of Charitable Gift Planners
76. National Association of Free and Charitable Clinics
77. National Council of Nonprofits
78. National Health Council
79. National Indian Child Welfare Association
80. National Urban Indian Family Coalition
81. Network of Jewish Human Service Agencies
82. New Hampshire Center for Nonprofits
83. New Jersey Association on Correction
84. New York Council of Nonprofits
85. Nonprofit Academy of Wisconsin
86. The Nonprofit Alliance
87. Nonprofit Association of the Midlands
88. Nonprofit Collaborative Inc
89. Nonprofit Leadership Alliance
90. Nonprofit New York
91. North Carolina Center for Nonprofits
92. North Dakota Association of Nonprofit Organizations
93. Ohio Association of Nonprofit Organizations
94. Oklahoma Center for Nonprofits
95. OneStar Foundation
96. Open990.org
97. OPERA America
98. Partners in Development Foundation
99. Pennsylvania Association of Nonprofit Organizations

100. Performing Arts Alliance
101. ProInspire
102. Responsive Caregivers of Hawaii
103. Rose Community Foundation
104. Service Year Alliance
105. Springfield Area Arts Council
106. Spudnik Press Cooperative
107. Syrian Community Network
108. Theatre Communications Group
109. Together SC
110. United Philanthropy Forum
111. United Way Worldwide
112. Utah Nonprofits Association
113. Volunteer Match
114. Volunteers of America
115. Washington Nonprofits
116. Washington State Community Action Partnership
117. WOCAN
118. Women's Equity Center and Action Network (WECAN)
119. Woodbury Fund
120. Worldwise Civil Society Consultancy
121. Wyoming Nonprofit Network
122. YMCA of the USA
123. YWCA USA
124. Alan Abramson, George Mason University*
125. Sam Allen, The Aspen Institute*
126. Ugo Ascoli
127. Matthew Baggetta, Indiana University*
128. Miguel Barbosa, CitizenAudit.org*
129. Teresa Behrens, Dorothy A. Johnson Center for Philanthropy, Grand Valley State University*
130. David Bell, Indiana University - Bloomington*
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132. Megan Bentzin
133. Jaron Bernstein
134. Owen Berson
135. Paula J. Beugen
136. Briana Bill
137. Portia Boggs, Local Food Hub*
138. Elsa Bondlow
139. Elizabeth Boris
140. Jennifer Brass, Indiana University*
141. Eleanor Brilliant
142. Ronni Brown
143. Grace Budrys, DePaul University*
144. Karen Buntin, Church Women United, Inc.*

145. John Burnam, Burnam Gray*
146. Brenda Bushouse, University of Massachusetts*
147. Saerin Cho
148. Maxine Clark, Clark-Fox Family Foundation*
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150. Rima Cohen, The Aspen Institute*
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170. Brad Fulton, Indiana University*
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172. Karen Gano, Lecturer, Columbia University School of Professional Studies Nonprofit Management Program*
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174. David Garvey, Nonprofit Leadership Program University of Connecticut*
175. Wendy Graham
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179. Chao Guo, University of Pennsylvania*
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183. Teresa Harrison, Drexel University*
184. Jonathan Hayden
185. Dan Heist, Brigham Young University*
186. Carrie Heron
187. Claudine Holaska
188. Chiako Hung, University of Hawaii at Manoa*
189. Fatima Hussain, ARNOVA*

190. Michael Jalkio
191. Aparna Jayashankar
192. Samantha Justice
193. Sawida Kamara, Fair Chance*
194. Jeffery Key, Project U.S.E.*
195. Richard King, Three Pillars Initiative*
196. Natasha Lane
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198. Heather Larson
199. Jesse Lecy, Arizona State University*
200. Wilson Levis
201. Laura Littlepage, Indiana University*
202. Lawrence Litvak, Stanford University*
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231. Andrea Reynolds
232. Camille Rochester, 501 Commons*

233. Patrick Rooney, Indiana University Lilly Family School of Philanthropy*
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235. Melinh Rozen, Platypus Advisors*
236. Shirley Sagawa
237. Francisco Santamarina
238. André Santiago
239. Marie Schlagel, Seattle Indian Health Board*
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252. Elizabeth von Gunten, Pacifica Radio Foundation*
253. Marlene Walk, Indiana University*
254. Laura Walling, Goodwill Industries International, Inc.*
255. Katya Wanzer, The Aspen Institute*
256. Chelsey Wheeler
257. Kirk Williams, Northern Illinois University*
258. Jessica Word, University of Nevada Las Vegas*
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*All opinions expressed herein are solely the individual's and are not to be attributed to any of the organizations with which she/he/they are associated.