

**CCD Paid Leave Ad Hoc Task Force Comments on the National Strategy to Support Family Caregivers**

**COMMENTS ON NARRATIVE:**

- 1. Which component of the strategy are you addressing with your comment?**
  - a. **The 2022 National Strategy to Support Family Caregivers narrative**
- 2. Within this component of the strategy, what are the three most important topics/issues for the Advisory Councils to focus on moving forward? (1500 Characters)**
  - a. The Paid Leave Ad Hoc Task Force focused on paid leave policy and will focus our comments on that subject. We would urge the Advisory Councils to focus on the following three topics which overlap the goals that have already been identified: 1) Highlighting the importance of enacting a paid family and medical leave program that has a broad family definition and includes all workers. 2) Ensuring that caregivers are aware of the options available to them, including current leave options (including unpaid FMLA leave and state paid leave programs, paid sick days, flexible work hours, etc.) and other services (see the comments of the CCD LTSS Task Force). 3) Ensuring that federal agencies are sufficiently collecting data about caregivers (including racial equity, disability, LGBTQ etc.), funding and conducting research on the use and impact of paid leave programs, and highlighting the needs of caregivers. These three goals would focus on the progress we need to make, while also helping caregivers learn about and helping them to access the limited programs and services they can access now.
  - b. We appreciate the mentions of paid leave through the narrative. In particular, we strongly support the call to action for lawmakers to pass a federal paid family and medical leave act. We also support the smaller outreach and engagement steps identified that would improve worker awareness of existing unpaid leave options.
- 3. Are there issues that are not covered in this component that should be addressed in future updates? (1500 Characters)**
  - a. We were disappointed to see that education on existing unpaid options is not comprehensively included throughout the strategy. It is equally important for CMS and HHS programs to educate caregivers on their currently available options as it is for not only ODEP and the Women's Bureau, but also all DOL to do so. Many caregivers are not aware of their rights or of options that may be available to them. Especially given the current direct care workforce crisis (as discussed in the narrative), ensuring that family caregivers know about and can

utilize unpaid leave, sick days, state paid leave, and other programs should be a top priority for the Administration.

- b. We are particularly concerned that the Narrative only suggested a broader definition of “family” that includes grandparents and kin caregivers. While obviously it is important to include grandparents and other caregivers, it is equally important to include siblings, grandparents, aunts, uncles, cousins, nieces, nephews, grandchildren, and domestic partners and others related by blood or affinity. We would urge revisions to the report to make it clear that all these individuals must be included in an expanded family definition.
  - c. We would also urge the Administration to ensure that data collection related to caregiving include not only demographic information, but information about gaps in the service system that result in great need for care (such as the number of hours of assessed need v. the hours actually staffed).
- 4. If you have additional comments on any aspect of the Strategy, please provide them below. (500 characters)**

The CCD Paid Leave Ad Hoc Task Force has developed principles ([https://www.c-c-d.org/fichiers/Updated-CCD-Paid-Leave-Principles\\_4-14-21.pdf](https://www.c-c-d.org/fichiers/Updated-CCD-Paid-Leave-Principles_4-14-21.pdf)) that detail how to ensure that a paid leave program is inclusive for people with disabilities. We would urge the Councils to incorporate these recommendations into future reports.

**COMMENTS ON FEDERAL ACTIONS:**

- 1. Which component of the strategy are you addressing with your comment?**
  - a. **Federal Actions**
- 2. Within this component of the strategy, what are the three most important topics/issues for the Advisory Councils to focus on moving forward?**
  - a. The Paid Leave Ad Hoc Task Force focused on paid leave policy and will focus our comments on these topics. Since federal paid leave legislation will require Congressional action, we will focus on the actions available to federal agencies. We believe education, outreach, and assistance for caregivers about their rights to paid and unpaid leave, sick days, and other workplace flexibilities are crucially important. In addition, research and data on caregivers is a second important topic for focus. In the absence of legislative action to expand paid leave, ensuring access to respite services for family caregivers is also crucial and we echo the comments of the CCD DD, Autism, and Family Support Task Force related to needed expansions of respite.



states to cover respite services as a standard benefit and to focus on ensuring that family caregivers have the supports they need.

**3. Are there issues that are not covered in this component that should be addressed in future updates?**

We would urge the Councils to consider adding a recommendation to Goal 4 that specifically urges states to end a comprehensive paid family and medical leave program that aligns with the principles we laid out ([https://www.c-c-d.org/fichiers/Updated-CCD-Paid-Leave-Principles\\_4-14-21.pdf](https://www.c-c-d.org/fichiers/Updated-CCD-Paid-Leave-Principles_4-14-21.pdf)). It would also be important to urge states to consider sick days legislation as well.

**4. If you have additional comments on any aspect of the Strategy, please provide them below.**