



# Paid Time Off: The Elements and Prevalence of Consolidated Leave Plans

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## Introduction

Paid Time Off (PTO) banks are an alternative to traditional paid leave plans that consolidate multiple types of leave (paid vacation, sick, and personal days) into a single plan. An employer does not designate leave for any particular reason, but instead simply gives employees one “bucket” of leave.<sup>1</sup>

Nearly one in five employees in the United States receive leave in the form of a PTO bank, but the contours of such policies are often little understood—especially outside of the human resources community. While private consulting firms have published studies on the use of such plans in the private sector for years, the Bureau of Labor Statistics (BLS) just began releasing some information about consolidated leave plans (i.e., PTO banks) in 2010.<sup>2</sup>

This report explores what is known, and what needs more study, about PTO banks. Other issues that may be addressed in later publications are union presence and PTO banks, the pros and cons for both employers and employees of offering PTO banks, the legal effects of state laws requiring payout of vacation time, how PTO banks work with no-fault absence policies, and the potential impacts of PTO banks on policy proposals.

It is important to note that many employees do not have any paid leave, through a PTO bank or otherwise. Indeed, there is no federal law that ensures that all workers have any leave—including *unpaid* leave; the Family Medical Leave Act (FMLA) only requires unpaid leave for those who work at companies with 50 or more employees. A 2007 U.S. Department of Labor report found that in 2005, 76.1 million workers—or only 54 percent of the workforce—were eligible for FMLA-protected leave.<sup>3</sup>

## What Is a PTO Bank?

Traditional leave systems separate time off into vacation, sick leave, personal leave, and other types of leave. In contrast, PTO banks typically combine all time off benefits into one cumulative bank of days which an employee can draw upon for any need. The contours of such plans vary by employer. The BLS defines a consolidated leave plan as one that “provides a single amount of time-off for employees to use for multiple purposes, such as vacation, illness, or personal business.”<sup>4</sup> PTO banks typically include these three main reasons for time off and therefore include time off needed for both scheduled and unscheduled absences. PTO banks tend not to include bereavement, jury duty, or holidays. Other leaves not typically included among PTO banks include short-term or

long-term disability leave, workers' compensation, and family and medical leave, or other specific types of leave for events like sabbaticals or performing community service.

## The Prevalence of PTO Banks

BLS first reported on PTO banks in 2010. In March 2011, about 19 percent of private industry employees in the U.S. had access to a PTO bank, compared with 18 percent in March 2010 (see appendix A).<sup>5</sup>

The reported prevalence of PTO banks varies depending on the data source and whether surveys are conducted at the employee or employer level. The BLS reports the percentage of employees who have access to PTO banks; various private surveys have been conducted that report the percentage of employers surveyed who offer PTO banks. Private surveys conducted by employer groups report a much higher prevalence of PTO banks than indicated by BLS data on the number of employees with the plans. Most recently, in May 2010, WorldatWork, a non-profit human resource association, reported in its survey *Paid Time Off Programs and Practices* that approximately 40 percent of the responding employers offer PTO banks.<sup>6</sup> WorldatWork's membership is comprised of human resource professionals from primarily Fortune 500 companies, which may explain the higher reported rate of PTO bank availability.<sup>7</sup> Another explanation for the higher reported rate of PTO banks is that the survey only asked employers about full-time employees, who are more likely to have PTO banks than part-time employees.<sup>8</sup>

While results of some private surveys suggest that access to PTO banks is growing, others indicate that it is leveling off or declining over time. In 2006, a Society for Human Resource Management article reported that the number of organizations moving to PTO banks had stopped growing, citing surveys conducted by Alexander Hamilton Institute which indicated that the percentage of employers using a traditional leave policy (56 percent) as opposed to a PTO bank had remained the same in 2005 and 2006.<sup>9</sup> Some human resource group surveys reported a decline in the number of employers offering PTO banks between 2006 and 2007.<sup>10</sup> WorldatWork's most recent survey of its members (May 2010) found a statistically significant increase in PTO banks between 2002, when 28 percent of companies reported using them, and 2010, when the number increased to 40 percent.<sup>11</sup> BLS has only released data on PTO banks for two years (2010-2011), though the proportion of workers with PTO banks increased slightly in that period.

## Which Employers Are Offering PTO Banks? Who Has Access to PTO Banks?

An analysis of March 2011 BLS data reveals interesting differences in which employers offer PTO banks and the types of workers who have access to them (see table 1). PTO banks are more prevalent at larger organizations. Employees of organizations with over 500 employees were approximately 20 percent more likely to have PTO banks than employees in organizations with under 50 employees—35 percent versus 14 percent (see table 1).

The health-care industry and the insurance industry are more likely to use PTO banks than are other industries. Forty-five percent of workers in the health-care industry have PTO banks and 48 percent of those in the insurance industry have PTO banks (see table 1). In 1996, the BLS noted that leave banks had been adopted in some establishments, "most notably those that must always remain open, such as hospitals and nursing homes."<sup>12</sup> The author of a survey conducted by the Alexander Hamilton Institute speculates that another reason for the greater use of PTO banks in certain industries is that they may not have a strong union presence.<sup>13</sup> The BLS data confirm that PTO banks are more prevalent in the non-union workforce—20 percent of non-union employees have a PTO bank, while 14 percent of the union workforce has a PTO bank (see table 2).

**Table 1.** Access to PTO banks in March 2011 among all private-sector workers; by industry and employer size

	Access to Vacation (Traditional or PTO Bank)	Access to Vacation as PTO Bank	Access to PTO Bank
<b>All Employees</b>	<b>77%</b>	<b>25%</b>	<b>19%</b>
<b><u>Selected Industries</u></b>			
Construction	70%	15%	11%
Manufacturing	95%	16%	15%
Retail trade	71%	12%	9%
Information	91%	18%	16%
Financial activities	92%	35%	32%
Insurance carriers and related	95%	51%	48%
Professional and technical services	89%	31%	28%
Educational services	57%	16%	9%
Health care and social assistance	84%	53%	45%
Accommodation and food services	47%	19%	9%
<b><u>Number of Employees</u></b>			
1 to 49 employees	68%	20%	14%
50 to 99 employees	76%	20%	15%
100 to 499 employees	82%	22%	18%
500 or more employees	90%	39%	35%

*Source:* Bureau of Labor Statistics (BLS) and Institute for Women's Policy Research (IWPR) Calculations; see appendix A.

*Note:* The first two columns are provided by the BLS results from the National Compensation Survey. The BLS reports the percentage of private-sector employees with access to vacation in either traditional or PTO bank (first column) and reports the percentage of private-sector employees who have that vacation as a part of a PTO bank (second column). It does not independently report the percentage of all employees who have access to a PTO bank. The third column, access to PTO banks, is the percentage of all private-sector workers with access to PTO banks. Its value is obtained by multiplying the proportion of employees with vacation by the proportion of employees whose vacation time is provided as consolidated leave, or PTO banks.<sup>14</sup>

## Which Employees Have PTO Banks?

Among employees with paid leave, lower-wage employees are less likely to have access to a PTO bank than a traditional paid vacation system. Fifty-one percent of employees in the lowest average wage quartile have access to any vacation time, and only 9 percent of the lowest wage employees have access to a PTO bank. Eighty-nine percent of employees in the highest wage quartile have access to vacation time and 28 percent have access to a PTO bank (see table 2). Similarly, part-time employees are less likely to have a PTO bank—9 percent of part-time employees have access to a PTO bank, as compared to 23 percent of full-time employees (see table 2).

**Table 2.** Access to vacation and PTO banks in March 2011 among all private-sector workers; by employee occupation, employee status, union status, and wage quartile

	<b>Access to Vacation (Traditional or PTO Bank)</b>	<b>Percent with Vacation as PTO Bank</b>	<b>Access to PTO Bank</b>
<b>All Employees</b>	<b>77%</b>	<b>25%</b>	<b>19%</b>
<b><u>Selected Occupations</u></b>			
Management, professional, and related	87%	37%	32%
Service	58%	26%	15%
Sales and related	69%	15%	10%
Office and administrative support	86%	28%	24%
<b><u>Employee Status</u></b>			
Full-time	91%	25%	23%
Part-time	37%	23%	9%
<b><u>Union Status</u></b>			
Union	90%	15%	14%
Non-union	76%	26%	20%
<b><u>Wage Quartile</u></b>			
Lowest 25% of wages	51%	18%	9%
Second 25% of wages	84%	25%	21%
Third 25% of wages	90%	23%	21%
Highest 25% of wages	89%	32%	28%

Source: Bureau of Labor Statistics, IWPR Calculations; see appendix A.

## How Much Time Off Is Available in a PTO Bank Versus a Traditional Vacation Plan?

When an employer considers switching from a traditional leave plan to a PTO bank, the number of days to include in a PTO bank is a major consideration. When determining the amount of time in a PTO bank, the amount of sick time has been identified as the “key variable.”<sup>15</sup> When computing the total days for a PTO bank, some employers add their standard vacation time but a lower number of paid sick days. The rationale behind this is explained in various ways. Most employers expect all days in a PTO bank to be used; few employers expect that all sick days will be used. Employers may choose to include only the average amount of sick time used in the PTO bank to avoid spending more than under their traditional plan. Others see this as a way to save money relative to a

traditional plan.<sup>16</sup> Another rationale for decreasing the number of days in a PTO bank is that employees are trading some amount of time off for the flexibility to decide how to use it, and the plans often allow employees to take time off in blocks of hours instead of entire days.<sup>17</sup>

The data suggest that workers with PTO banks have close to the same number of days off as the combined number of paid sick and vacation days in traditional plans, but more data are needed to make exact comparisons. The mean number of days in a PTO bank that an employee with one year of service has is 15 (see table 3). Using the mean numbers available to employees with traditional leave plans, employees have access to 16 paid sick and vacation days combined (see table 3). The comparability of PTO banks and traditional leave plans depends on the types of leave that are included in the PTO bank. Many consolidated leave plans include personal days in addition to sick and vacation days. However, while the BLS reports that 38 percent of employees have paid personal leave,<sup>18</sup> it does not publish the number of personal days offered per year.<sup>19</sup> Thus, it is not possible to conclude, based on current data, that a consolidated leave plan results in an increase or a decrease in the total amount of available days off.

The number of paid sick days per year does not vary substantially with years of service (see table 3). In contrast, vacation time does increase substantially with years of service. Similarly, the amount of time in PTO banks increases with years of service. A rationale for the increase in vacation time with years of service may be that employers think it is appropriate to reward long-term employees with more vacation leave, but may not think the same is true for illness, which is beyond an employee's control.<sup>20</sup>

**Table 3.** Average amount of sick leave, vacation, and PTO banks available to private-sector workers receiving benefits; by length of service

Length of Service	Days of Paid Sick Leave	Days of Vacation (No PTO Bank)	Days of PTO Bank
1 year	8	8	15
5 years	8	12	20
10 years	9	15	23
20 years	9	17	25

Source: Bureau of Labor Statistics.<sup>21</sup>

## What Information Is Still Needed About PTO Banks?

While the BLS data are critical to understanding PTO banks, many questions remain. The BLS survey does not cover important aspects of these plans, such as accrual and waiting periods, rollover and payout, and demerits/punishment for using time off. The BLS should conduct further research into these aspects of PTO banks. Some private surveys address these under-explored topics.

**Accrual:** PTO banks, like traditional forms of leave, can be accrued over time or given in an annual allotment. Whether time off is accrued or offered in lump sum may affect how much time off an employee has available at any given time. According to private surveys, accrual is the most common method used for PTO banks. In the 2010 WorldatWork survey, 85 percent of organizations surveyed required employees to accrue time in a PTO bank during the year, while the remaining 15 percent gave a yearly allocation, usually at the beginning of the year.<sup>22</sup>

**Waiting period:** Another important question not addressed in the BLS data is whether there is a waiting period for new hires before they can take time off. If a need for time off arises during a waiting period, an employee may not be able to access the time they need. In the WorldatWork study, 40 percent of the organizations surveyed reported that employees could use time in a PTO bank as of the date of hire;<sup>23</sup> however, if the organization requires an employee to accrue time during the year, it is logical to conclude that they would not have any time in a PTO bank to use on the date of hire. Twenty-eight percent reported that employees could use time in a PTO bank after a specified number of days, and of those 28 percent, 89 percent specified that the time could be used after 90 days.<sup>24</sup>

**Roll-over:** An important issue in the design of a PTO bank is what to do with unused PTO at the end of the year. How employers treat PTO at the end of the year can create different incentives. Some policies allow employees to roll over PTO into the next year, and some do not. Some may cap the amount that can be rolled over or the total amount in the “bank.” Other policies limit carryover so that if the company is required to pay out unused time at the end of employment, it is not hit with a large sum.

Private studies have found that PTO banks are more likely to have time rolled over than traditional vacation or sick time. Fifty-five percent of organizations in the WorldatWork study reported that entire amounts of unused PTO are rolled over to the next year, and 11 percent reported that it is totally forfeited, with the remaining organizations somewhere in between.<sup>27</sup> For organizations with a traditional leave system, 36 percent reported vacation time was entirely rolled over, 45 percent said sick time was entirely rolled over, and 10 percent said personal time was entirely rolled over.<sup>28</sup> Thirty-five percent said vacation time was forfeited, 43 percent said sick time was forfeited, and 80 percent said personal time was forfeited (again, the remaining organizations were somewhere in between).<sup>29</sup>

**Pay-out on termination:** Vacation time is more likely to be paid out on termination than time in PTO banks, probably due to state laws requiring it. PTO banks are more likely to be paid out than sick time. Eighty-eight percent of organizations in the WorldatWork study reported that PTO banks are paid out in cash when an employee separates from the organization.<sup>30</sup> For organizations that use traditional systems, 91 percent pay out vacation in cash, 82 percent pay out sick time in cash, and 79 percent report paying out personal time in cash.<sup>31</sup>

### No-Fault Attendance Policies

Some employers use absence control policies (sometimes called no-fault attendance policies, demerits, or progressive discipline policies) to reduce employee absence by creating systems where punishments result if too much leave is used over a period of time. Forty-nine percent of private-sector employees who reported that they had paid sick days in an Institute for Women’s Policy Research poll also reported that their employers have such a policy in place.<sup>25</sup> In a WorldatWork study, among employers providing employees with traditional sick leave, forty percent of responding organizations reported counting sick time under a no-fault attendance policy or another absence control policy.<sup>26</sup>

It is not clear from existing data whether employers with PTO policies are more or less likely than employers with traditional leave systems to use absence control policies.

### Cashing Out PTO

The University Medical Center associated with the University of Rochester, in Rochester, N.Y., allows employees to cash out unused PTO, dollar for dollar, or contribute it to their retirement plans.<sup>32</sup> The company sees this as a way to encourage employees to use PTO if they are sick, but also to provide an incentive against end-of-year use by rewarding those who do not use the leave.<sup>33</sup>

## Research Is Still Needed

The following are suggestions for research needed to better understand the use of PTO banks and the effects on businesses and employees.

***The government should continue to collect reliable data about the prevalence and detailed characteristics of PTO banks. The BLS could expand its data collection and reporting to include:***

- The average number of personal days available annually, as it does currently for sick leave and vacation.
- All types of time off that are included in the definition of consolidated leave.
- How employees can take time off that is in a PTO bank; for example, can they take time off in small blocks, such as hours, or are they required to take it in full days or other increments?
- Whether employers with PTO banks have a waiting period before using them and if so, how long.
- How time in PTO banks is offered to employees; whether it is accrued, given in a lump sum, or some other method.
- Whether time in PTO banks rolls over at the end of the year and whether it is paid out upon termination. This data would be useful for all forms of leave.
- Whether no-fault attendance policies (or demerits) are used in PTO banks and other traditional time off plans and whether those with PTO banks are more or less likely to be punished for utilizing leave than those with traditional forms of leave time.

***Research should be undertaken to measure first-hand employee opinions of PTO banks.***

Currently, the research does not adequately show, from an employee's perspective, whether PTO banks are considered better or worse than traditional leave plans. Existing studies survey companies and human resources professionals. It would be valuable to collect employees' perspectives directly. Research could consist of interviews, focus groups, or surveys.

In addition to determining employees' views toward PTO banks, it would be helpful to know what time in PTO banks is used for in practice; for example, whether employees are using time in PTO banks when they are sick, for family obligations, or for other reasons. It is unlikely that employers collect this information, as one of the purposes of PTO banks is to "stay out" of employees' personal lives. Thus, any survey would best be directed at employees, not employers.

## Conclusion

PTO banks are an important human resource development and one that is not yet fully understood. The BLS has taken an important step forward in publishing data on PTO banks, but further research is needed on the details of existing PTO banks and their impact on both employers and employees. The authors invite you to submit experiences with PTO banks, research questions, or other comments, to Andrea Lindemann at [alindemann@clasp.org](mailto:alindemann@clasp.org).

## Appendix A

## PTO Bank Access, March 2011; by Worker and Employer Characteristics

	Access to Vacation	Percent of Vacation as PTO Bank	Access to PTO Bank
<b>All Workers</b>	<b>77%</b>	<b>25%</b>	<b>19%</b>
<b><u>Worker Characteristics</u></b>			
Management, professional, and related	87%	37%	32%
Management, business, and financial	96%	31%	30%
Professional and related	83%	41%	34%
Service	58%	26%	15%
Protective Service	62%	22%	14%
Sales and Office	79%	23%	18%
Sales and related	69%	15%	10%
Office and administrative support	86%	28%	24%
Natural resources, construction, and maintenance	80%	14%	11%
Construction, extraction, farming, fishing, and forestry	69%	16%	11%
Installation, maintenance, and repair	90%	13%	12%
Production, transportation, and material moving	83%	14%	12%
Production	90%	16%	14%
Transportation and material moving	75%	11%	8%
<b><u>Employee Status</u></b>			
Full-time	91%	25%	23%
Part-time	37%	23%	9%
<b><u>Union Status</u></b>			
Union	90%	15%	14%
Non-union	76%	26%	20%

<b><u>Wage Quartile</u></b>			
Lowest 25% of wages	51%	18%	9%
Second 25% of wages	84%	25%	21%
Third 25% of wages	90%	23%	21%
Highest 25% of wages	89%	32%	28%
<b><u>Minimum/Maximum Wage Earners</u></b>			
Lowest 10% of wages	38%	15%	6%
Highest 10% of wages	90%	31%	28%
<b><u>Establishment Characteristics</u></b>			
Goods-producing industries	88%	16%	14%
Construction	70%	15%	11%
Manufacturing	95%	16%	15%
Service-providing industries	75%	27%	20%
Trade, transportation, and utilities	78%	12%	9%
-Wholesale trade	89%	15%	13%
-Retail trade	71%	12%	9%
-Transportation and warehousing	85%	9%	8%
-Utilities	96%	13%	12%
Information	91%	18%	16%
Financial activities	92%	35%	32%
Finance and insurance	95%	38%	36%
-Credit intermediation and related	96%	30%	29%
-Insurance carriers and related	95%	51%	48%
Real estate and rental and leasing	83%	26%	22%
Professional and business services	76%	28%	21%
Professional and technical services	89%	31%	28%
Administrative and waste services	60%	23%	14%
Education and health services	80%	49%	39%
Educational services	57%	16%	9%
-Junior colleges, colleges, and universities	72%	11%	8%
Health care and social assistance	84%	53%	45%
Leisure and hospitality	48%	17%	8%
Accommodation and food services	47%	19%	9%
Other services	67%	12%	8%

<u>Number of Employees</u>			
1 to 49 employees	68%	20%	14%
50 to 99 employees	76%	20%	15%
100 to 499 employees	82%	22%	18%
500 or more employees	90%	39%	35%
1 to 99 employees	70%	20%	14%
100 or more employees	86%	30%	26%
<u>Region</u>			
New England	75%	28%	21%
Middle Atlantic	76%	19%	14%
East North Central	78%	26%	20%
West North Central	76%	28%	21%
South Atlantic	79%	26%	21%
East South Central	78%	26%	20%
West South Central	80%	23%	18%
Mountain	77%	31%	24%
Pacific	75%	25%	19%

Source: *National Compensation Survey*, Bureau of Labor Statistics, March 2011 (published July 2011), Table 33.

<http://www.bls.gov/ncs/ebs/benefits/2011/ownership/private/table21a.pdf>; see also Table 39.

<http://www.bls.gov/ncs/ebs/benefits/2011/ownership/private/table43a.pdf>.

<sup>1</sup> The term PTO “bank” in this paper refers to paid time off for an *individual*, in contrast to a *group* bank through which employees can access other employees’ donated leave.

<sup>2</sup> The federal government collects data on compensation and benefits through the National Compensation Survey (NCS). The NCS collects information about different types of leave, such as sick, holiday, and vacation, but until recently, it only published data on them as separate programs and did not publish data on consolidated leave plans. This paper does not discuss state-level data.

<sup>3</sup> Victoria A. Lipnic and Paul DeCamp, *Family and Medical Leave Act Regulations: A Report on the Department of Labor’s Request for Information*, U.S. Department of Labor, June 2007, ii. [http://digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1320&context=key\\_workplace](http://digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1320&context=key_workplace); Kevin Miller, *The FMLA: Old Enough to Vote, but with Room to Grow*, Institute for Women’s Policy Research, February 2011.

<http://www.iwpr.org/blog/2011/02/04/the-fmla-old-enough-to-vote-but-with-room-to-grow/>.

<sup>4</sup> *National Compensation Survey*, Bureau of Labor Statistics, March 2010, Table 37, footnote 1.

<http://www.bls.gov/ncs/ebs/benefits/2010/ownership/private/table43a.pdf>. The BLS numbers used in this paper apply to the private industry workforce unless otherwise specified. The terms “consolidated leave” and “PTO bank” are used interchangeably in this paper.

<sup>5</sup> For the purposes of this report, access to PTO banks is rounded up to 19 percent.

<sup>6</sup> *Paid Time Off Programs and Practices: A Survey of WorldatWork Members*, May 2010, 1. <http://www.worldatwork.org/waw/adimLink?id=38913>.

WorldatWork e-mailed 6,735 survey invitations to its members and received 1,222 responses, an 18 percent response rate.

<sup>7</sup> “Paid Time Off is Taking Off” audioconference call transcript, Center for Law and Social Policy, June 1, 2010.

[http://www.clasp.org/admin/site/publications/files/CLASP\\_070110\\_transcript.pdf](http://www.clasp.org/admin/site/publications/files/CLASP_070110_transcript.pdf).

<sup>8</sup> Ibid.

<sup>9</sup> Stephen Miller, *Paid Time Off: Growth of PTO Programs Hits Plateau, Despite Benefits*, Society of Human Resource Management, October 15, 2006.

<sup>10</sup> Frank Giancola, “Are PTO Plans All They’re Cracked Up to Be?” *Workspan: The Magazine of WorldatWork*, June 2008, 22.

<sup>11</sup> *Paid Time Off Programs and Practices*, 2, footnote 3. <http://www.worldatwork.org/waw/adimLink?id=38913>.

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<sup>12</sup> *Employee Benefits in Small Private Establishments*, Bureau of Labor Statistics, Bulletin 2475, February 1996.

<sup>13</sup> <ftp://ftp.bls.gov/pub/special.requests/ocwc/ebs/sml94.txt>.

<sup>14</sup> *2009 Survey of Traditional Time Off and PTO Program Practices*, Alexander Hamilton Institute, 3.

<sup>15</sup> The NCS generally considers vacation leave to be included in consolidated leave plans, but plans may or may not include sick leave. In recently released data, the BLS reported that 22 percent of private sector workers with paid sick leave received that leave through a consolidated leave plan. See Ross O. Barthold and Jason L. Ford, *Paid Sick Leave: Prevalence, Provision, and Usage among Full-Time Workers in Private Industry*, Bureau of Labor Statistics, February 2012. <http://www.bls.gov/opub/cwc/cm20120228ar01p1.htm>.

<sup>16</sup> Michael Markowich, "PTO the Star of the Benefits World," *Workspan: The Magazine of WorldatWork*, February 2006, 38.

<sup>17</sup> Rodney K. Platt, "White Paper" on PTO Banks, *WorldatWork*, December 2003.

<sup>18</sup> Steven F. Cyboran, "Paid Time Off: Is It Right for Your Organization?" *Workspan: The Magazine of WorldatWork*, April 2008, 46.

<sup>19</sup> *National Compensation Survey*, Bureau of Labor Statistics, March 2011, Table 33.

<http://www.bls.gov/ncs/ebs/benefits/2011/ownership/private/table21a.htm>.

<sup>20</sup> Robert VanGiezen, e-mail to author, August 29, 2011.

<sup>21</sup> *2009 Survey of Traditional Time Off and PTO Program Practices*, 4.

<sup>22</sup> *National Compensation Survey*, Table 39. <http://www.bls.gov/ncs/ebs/benefits/2011/ownership/private/table43a.pdf>;

*National Compensation Survey*, Table 36. <http://www.bls.gov/ncs/ebs/benefits/2011/ownership/private/table38a.htm>.

<sup>23</sup> *Paid Time Off Programs and Practices*, 12. <http://www.worldatwork.org/waw/adimLink?id=38913>.

<sup>24</sup> *Ibid.*, 13.

<sup>25</sup> *Ibid.*

<sup>26</sup> *Paid Sick Days and Employer Penalties for Absence*. Institute for Women's Policy Research. July 2011. [http://www.iwpr.org/publications/pubs/paid-sick-days-and-employer-penalties-for-absence/at\\_download/file](http://www.iwpr.org/publications/pubs/paid-sick-days-and-employer-penalties-for-absence/at_download/file).

<sup>27</sup> *Paid Time Off Programs and Practices*, 24. <http://www.worldatwork.org/waw/adimLink?id=38913>.

<sup>28</sup> *Ibid.*

<sup>29</sup> *Ibid.*, 15.

<sup>30</sup> *Ibid.*, 23.

<sup>31</sup> *Ibid.*

<sup>32</sup> *Ibid.*, 16.

<sup>33</sup> *Ibid.*, 24.

<sup>34</sup> Martha Frase, "Taking Time Off to the Bank," *Society of Human Resources HR Magazine*, vol. 55, no. 3 (March 1, 2010).

<sup>35</sup> *Ibid.*