



Council of Senior Centers & Services of NYC, Inc.

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December 12, 2013

Councilwoman Debi Rose
Chair, Civil Rights Committee
250 Broadway
New York, New York 10007

Dear Chairperson Rose,

On behalf of the Council of Senior Centers and Services (CSCS) and its members serving 300,000 older New Yorkers, we applaud you for introducing legislation and holding a public hearing on protecting caregivers from discrimination in the workplace. We apologize that we weren't able to testify in person, but wanted to submit this response as caregiving is a priority issue at CSCS.

The MetLife Study of *"Caregiving Costs to Working Caregivers: Double Jeopardy for Baby Boomers Caring for Their Parent"* estimated the value of lost wages, pensions, and Social Security due to caregiving responsibilities, which they have termed the "caregiver glass ceiling" (MetLife, 2010). Notably, for women, the total individual amount of lost wages due to leaving the labor force early and/or reduced hours of work because of caregiving responsibilities equals \$142,693. The estimated impact of caregiving on lost Social Security benefits is \$131,351. A conservative estimated impact on pensions is approximately \$50,000. ***Thus, the total cost impact of caregiving on the individual female caregiver equals \$324,044.***

The 2006 Met Life *Caregiving Cost Study: Productivity Losses to the U.S. Businesses* found that companies lose as much as \$33.6 billion annually in worker productivity because of their employees' caregiving obligations. The reported stated that 60% of caregivers nationwide are employed. ***Accommodating caregivers in the workforce and providing access to affordable elder care are the workforce security issues of the 21st century as people live longer and want to age in place at home. Families provide the vast majority of elder care, but need support and legal protection.***

In the summer and fall of 2013, CSCS along with AARP and the NY State Caregiving and Respite Coalition held 12 caregiver listening sessions across the state. Caregivers called out for respite care – home care, adult day, and other supportive services - to allow them to work and take care of other responsibilities in their lives. Legal protection in the workplace is important for millions of caregivers in NYC. Out of these listening sessions, came a policy report, *"Caregivers in Crisis: NY State Must Act"*, November 2013. Full report can be found at www.cscs-ny.org

The average age of caregiver nationally is a 49 year old woman who works outside the home and providing more than 20 hours per week of unpaid care to her mother for five years. These are individuals in the midst of their career who are juggling many important responsibilities. Accommodation in the work place would relieve stress and provide pragmatic solutions to difficult and often unpredictable situations.

Recommendations for Intro 863:

1. ***The November 2013 Caregivers in Crisis report defines family caregiver as any unpaid relative, partner, friend, or neighbor who has a significant relationship with and who provides a range of assistance for an older adult or an adult with a chronic or disabling condition(s).*** The term “caregiver” in Intro 863 includes a person who provides the “ongoing care of a person or persons in a dependent relationship with the caregiver who suffer(s) from a disability”. In order to be as inclusive as possible, it is critical that the definition of who can be covered under Intro 863 include those taking care of “frail” parents or other loved ones. It is unclear what the legal definition and threshold of “disability” means in this legislation. This could be a red flag inadvertently excluding thousands of caregivers who care for someone who is “frail”, but not necessarily disabled. Definitions and requirements must be spelled out clearly.

An example of frailty and disability comes into play in the Access-a-Ride program. Under the Access-a-Ride program, someone has to be “transportation disabled” meeting certain criteria. If you are unable to use public transportation due to age and frailty and cannot meet the definition of disability, you may not be able to use Access-a-Ride or get its full package of benefits.

2. The term “dependent relationship” should include friend and neighbor. It is not unusual for a friend or neighbor to provide many hours of unpaid care to a dependent individual.
3. Clarification on what “reasonable accommodation” includes would be helpful to both employees and employers.

CSCS would appreciate being included in any further discussions regarding Intro 863. Please feel free to contact Bobbie Sackman, Director of Public Policy, (212) 398-6565 x226 or bsackman@cscs-ny.org Thank you for the opportunity to respond to this important legislation.

Sincerely,



Igal Jellinek
Executive Director