

Chaos, Accomplishment, and Work, or, What I Learned on Paternity Leave

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Late in life, minding my own business, I was blessed with a baby girl. My wife, Erin, was a federal employee and thus—somewhat surprisingly—not entitled to any maternity leave other than accumulated vacation and sick days. As a pampered law professor, on the other hand, I received a full semester off, so long as I was the primary caregiver to the child. Put that together with the usual summer vacation, and I had a full six months to spend with our little bundle of joy after Erin went back to work.

I found it a difficult experience. This was not because Caroline was a particularly difficult baby. There was, to be sure, the usual quantum of screaming and sleep deprivation. And as a scholar of the structural Constitution, I find the completely unaccountable power of an infant who can neither be reasoned with nor overruled difficult to accept.¹ But I came to realize that the real reason for my discomfiture was that what I was doing in caring for my daughter did not fit comfortably with my accustomed notions of work and accomplishment. Working through why that was so can, I think, tell us something useful about how we think about work, the messages we send our students about what they should aspire to in their careers, and even—perhaps—a philosophy of social change and the good life.

But first, my tale of woe.

“HI HONEY, WHAT DID YOU DO TODAY?”

I had entertained high hopes about what I might accomplish with the large blocks of time that paternity leave would afford me. I assumed that my sweet child would nap for hours at a time, and during those naps I would pursue long-put-off projects impossible in the ordinary hurly-burly of teaching and institutional service obligations. I would finally write that book pulling together all my

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1. See, e.g., THE FEDERALIST NOS. 47, 48, & 51 (James Madison) (emphasizing that *everyone* ought to be subject to some sort of checks and balances).

scholarship on American federalism. I would learn to play *Rhapsody in Blue* on my Steinway. All the big, long-term ambitions that I had harbored for years would finally come to fruition.

But there were no naps. Or, I should say, there *were* naps but they were on baby Caroline's terms—not mine. My little tyrant's napping policy demanded that I be holding her at all times in order for sleep to occur. This meant that only activities that could be performed seated and with an infant in the crook of one arm—no typing—would be on the agenda. Writing was out, and Gershwin was a pipe dream. And in any event, most of Caroline's day was not spent napping. Life became a daily round of changing diapers, thawing out stored milk and administering the bottle, and pushing the stroller around the neighborhood.

This was all more than a little bit hard to take. The problem was not simply that I was trying to do things that our culture has traditionally framed as "women's work."² It is still true that "nearly all of the work we officially classify as domestic in America is done by women: the cleaning, the care of the very young, the care of the very old."³ But even your humble author is not so Neanderthal as to doubt that this state of affairs is wrong or to feel somehow "above" this sort of labor. I did insufficiently appreciate how deeply traditional gender roles cut in the male (and female) psyche.⁴ But most importantly, I did not comprehend going in how such roles represent fundamentally different understandings of work and achievement—and how much those understandings would affect the self-perceived value of what I was doing.

When Erin came home from work and asked, "What did you do today?", I had no good answer. Most days I had not even managed to cook her dinner (which, Ward Cleaver-style, she pretty much thought I ought to do). I certainly had not made any progress in the way that I had come to define "progress" as a lawyer and a legal academic. I could not point, at day's end, to a tangible amount of research completed, to 1500-odd words written toward my next article, or a 90 minute class taught. If I asked myself—as I had been accustomed to ask myself—"What did you get *done* today?", the answer was pretty much, "nothing."

Now repeat that daily self-indictment for six months. Paternity leave has all the downsides that accompany other variants of at-home work: the lack of human social contact (at least with the sort of humans who can employ words and are unlikely to spit up on you), the absence of any externally-imposed structure organizing your time, the unfortunate tendency not to shave. But the truly hard part was the sense that I was spinning my wheels, not accomplishing anything. At the end of each day I was exhausted, but I had nothing to show for it.

2. See, e.g., *Breadwinner Moms*, PEW RESEARCH CTR. (May 29, 2013), <https://www.pewsocialtrends.org/2013/05/29/breadwinner-moms/> (reporting skeptical public attitudes toward men as primary caregivers for young children).

3. Mary Townsend, *Housework*, 18 HEDGEHOG REV. 114, 117 (2016), <https://hedgehogreview.com/issues/work-in-the-precarious-economy/articles/housework>. In 2018, 94 percent of persons employed in childcare were women. See *Labor Force Statistics from the Current Population Survey*, U.S. BUREAU OF LABOR & STATISTICS, <https://www.bls.gov/cps/cpsaat11.htm> (last visited Jan. 18, 2020).

4. See, e.g., CAROL GILLIGAN, IN A DIFFERENT VOICE: PSYCHOLOGICAL THEORY AND WOMEN'S DEVELOPMENT 5–23 (1982).

I hasten to add that my wife did not encourage this feeling of inadequacy. Her view was: “If I return home from work and the child is still breathing, then you have done your job for the day.” At the time, I couldn’t help suspecting that this somewhat low bar was a product of prior experience with her feckless spouse. On reflection, I think she may simply have had a little firmer grasp than I did of an alternative model of work and accomplishment.

TWO MODELS OF WORK AND ACCOMPLISHMENT

My mother is one of the smartest people I know. Valedictorian of her small West Texas high school, she graduated with honors from the University of Texas in the early 1960s. After a year teaching high school English, she married my father and, when I came along not too long after, she decided to stay home and raise me (and later my brother) while Dad put in 20 years in the Air Force. I have often wondered what she might have accomplished if she had not chosen to devote her life to my brother and me—and perhaps if she had been born at a time when bright young women were more broadly encouraged to pursue their own careers.

Mom chose a very traditional female role. As Judith Resnik noted in her important study of the use of “housekeeping” terminology in Federal Courts law, “[h]ousekeeping’ is not . . . often a source of pride.”⁵ Professor Resnik also observed that “[p]art of the reason why one can so readily read ‘housekeeping’ to mean something of secondary importance is that housekeeping has a gender—that gender is female, and it is we (women) who are the ‘second sex.’”⁶ It’s not clear to me, however, that my mother felt particularly downtrodden or disparaged in her role. She did it well, expanding her circle of care to include many younger families that passed through Dad’s flight crew and raising at least one productive member of society (my brother, who became a public school superintendent rather than a shiftless law professor). Mom lived her life surrounded by other capable women who had made similar choices and were unlikely to discount her traditionalism. And my impression is that nowadays Americans are increasingly aware that “housework” or childrearing is real work, and many more of us accord it the dignity and respect that it so abundantly deserves.⁷

None of this is to deny that the “second shift” of childrearing and other housework, still worked overwhelmingly by women, takes an unacceptable toll on our society. As Arlie Hochschild has argued, that toll bears not only on women but on marriages and the relations between fathers and children.⁸ But that subject—which Professor Hochschild and others have developed so compellingly—is not my subject in this Essay. Rather, I want to focus on how the sort of work involved in childcare is *different* from other forms, like founding a

5. Judith Resnik, *Housekeeping: The Nature and Allocation of Work in Federal Trial Courts*, 24 GA. L. REV. 909, 930 (1990).

6. *Id.* at 930.

7. See, e.g., *id.* at 958 (collecting work by feminist historians documenting that household tasks are “work”). For a philosophical exploration of the dignity of housework, see Townsend, *supra* note 3; As Professor Townsend acknowledges, however, “most human beings over our history have paid or guilted other people to clean house if they possibly, possibly could.” *Id.*

8. See ARLIE HOCHSCHILD WITH ANNE MACHUNG, *THE SECOND SHIFT: WORKING FAMILIES AND THE REVOLUTION AT HOME* 252–54 (2012).

company, building a skyscraper, or writing law review articles. The distinctive character of childcare and other housework is, in fact, more widely shared among other occupations than we commonly believe. It is time we took it seriously.

For me, the thing about housework and childcare is that it's rarely additive—that is, the fact that you cooked dinner yesterday doesn't mean you don't have to do it again today. If you vacuumed the rug, took out the trash, or did the laundry yesterday, chances are you'll need to do all that again pretty soon. And to my great chagrin, changing that poopy diaper in the morning never meant I'd escape having to change another (often even more spectacularly) poopy one that evening. As Simone de Beauvoir put it, "[f]ew tasks are more like the torture of Sisyphus than housework, with its endless repetition: the clean becomes soiled, the soiled is made clean, over and over, day after day. The housewife wears herself out marking time: she makes nothing, simply perpetuates the present . . ."⁹ Childcare is also the sort of thing that others are most likely to notice when you've done some aspect of it poorly. It's much more likely to leave you feeling inadequate than awesome at the end of the day.

Erin captured these qualities when she said I'd have done my job as long as baby Caroline was still alive when Erin returned home in the evening. My remit was not to build anything or create some lasting improvement in our affairs, but rather just to maintain Caroline at a reasonable level of comfort, nutrition, and sanitation for a specified interval of time. Over the long term, of course, Erin and I were trying to accomplish the rearing of a healthy, educated, well-mannered, and non-smelly new citizen of the Republic. But as much as childhood passes in the blink of an eye in retrospect, parents don't really experience it that way *in medias res*. We just try to maintain a (sometimes only barely) acceptable status quo against the forces of entropy besieging us at all times—hunger, sleep deprivation, grime, poopy diapers. Parents, really, are just trying to hold back the chaos.

My mother held back the chaos in our family for over two decades while my brother and I were kids. In many ways in our family, she still does; as life wore on, she took up other caring roles—looking after my parents' parents, refereeing disputes in the extended family, orchestrating family gatherings—that had a similar quality. I recall no reason to think she found this mode of work unfulfilling. But I suspect it is a harder role for men. We are socialized to think that we need to go out and build things—a building, a company, even a book or a symphony. We formulate goals and try to work toward them, and these goals usually involve a change in our circumstances, not simply the maintenance of our present condition. We closely monitor our progress toward those goals. Men need something to *show* at the end of a day—or a life.¹⁰

9. SIMONE DE BEAUVOIR, *THE SECOND SEX* 539 (Constance Borde & Sheila Malovany-Chvallier trans., Vintage Books Ed. 2011) (1949). See also Townsend, *supra* note 3 ("Children in the house don't merely multiply the work, they constantly undo it; and they themselves require ever-renewed, constant cleaning.").

10. See generally GILLIGAN, *supra* note 4; see also Samuel Smithers, *Goals, Motivation, and Gender*, 131 *ECON. LETTERS* 75 (2015) (behavioral economics study finding that "men are more responsive to goals than women"). Or try Steve Friedman, *Why Men Need to Build Things*, *REAL SIMPLE* (Dec. 7, 2017), <https://www.realsimple.com/work-life/steve-friedman-essay>.

These models of work and accomplishment need not be tied too closely to gender.¹¹ One of the most compelling examples of the “something to show” model in my own recent memory comes from Dr. Mae Jemison, the first black woman in space, who gave the commencement address at Rice University when my son, Alex, graduated in 2017. Perusing Dr. Jemison’s resume—chemical engineer, medical doctor, Peace Corps volunteer, entrepreneur, *astronaut*—would make nearly anyone think they had little to show for their own life.¹² Dr. Jemison’s actual commencement address at Rice—unlike many such addresses—arguably left room for a variety of different senses of accomplishment; it’s hard to quarrel with an exhortation to “live deeply and look up.”¹³ But the University’s implicit message in choosing Dr. Jemison—an *astronaut*, for gosh sake, who had broken not only the sound barrier but the gender and color line—was very much in line with this traditionally male sense of accomplishment. Go do something grand; be first at something; change the world.

The important point is not so much that these models of work and accomplishment are inherently tied to gender as that they are *different*—that is, that we lose something important when we try to assess all kinds of work in the same way. Thinking of these models in their traditional gendered images makes them less abstract, and it may even point us in the direction of treating them with equal respect. We are a society that has come to value parenting; we increasingly acknowledge that a mother’s care for her children is “real work,” and data on parenting styles shows a marked uptick in parental investment by both mothers and fathers.¹⁴ What is less widely appreciated, I think, is just how pervasive the “holding back the chaos” model of work is even in fields *not* traditionally regarded as “women’s work.”

11. As will be clear, my ultimate argument concerns the need to decouple these roles and attitudes from gender.

12. See *Mae Jemison*, WIKIPEDIA, https://en.wikipedia.org/wiki/Mae_Jemison (last visited Nov. 1, 2019). Typing “Mae Jemison” into the Amazon catalog yields a seemingly infinite number of inspirational biographies of Dr. Jemison written for young people. See, e.g., ALLISON LASSIEUR, *ASTRONAUT MAE JEMISON* (2016) (in the “STEM Trailblazer Bios” series); JANEY LEVY, *MAE JEMISON* (2019) (in the “Heroes of Black History” series). Young Miss Caroline will definitely be pressed to read one or two of these when she is old enough.

13. See Amy McCaig, *Jemison: ‘Life is Best When You Live Deeply and Look Up,’* RICE UNIV. NEWS & MEDIA RELATIONS (May 13, 2017), <http://news.rice.edu/2017/05/13/jemison-life-is-best-when-you-live-deeply-and-look-up/>.

14. See, e.g., Gretchen Livingston & Kim Parker, *8 Facts About American Dads*, PEW RESEARCH CTR. (June 12, 2019), <https://www.pewresearch.org/fact-tank/2019/06/12/fathers-day-facts/>; *Parents Now Spend Twice as Much Time with their Children as 50 Years Ago*, ECONOMIST (Nov. 27, 2017), <https://www.economist.com/graphic-detail/2017/11/27/parents-now-spend-twice-as-much-time-with-their-children-as-50-years-ago> (“One analysis of 11 rich countries estimates that the average mother spent 54 minutes a day caring for children in 1965 but 104 minutes in 2012. Men do less than women, but far more than men in the past: their child-caring time has jumped from 16 minutes a day to 59.”). Inequities remain, of course. See *id.*; HOCHSCHILD & MACHUNG, *supra* note 8; Anne-Rigt Poortman & Tanya Van Der Lippe, *Attitudes Toward Housework and Child Care and the Gendered Division of Labor*, 71 J. MARRIAGE & FAM. 526, 526 (2009) (“One of the most consistent empirical observations in family research is that women still do most of the housework and child care . . . even though women’s participation in the labor force has increased considerably.”).

YOU DIDN'T BUILD THAT—BUT MAYBE YOU KEPT IT FROM FALLING APART

One reason my mother had to hold back so much chaos was that my father was in the Air Force and frequently unable to come home. Dad was a pilot in the Strategic Air Command (SAC), the branch of the Air Force responsible for maintaining strategic bomber and missile forces, equipped with nuclear weapons, during the Cold War. He was thus frequently either deployed in garden spots like Goose Bay, Labrador, or confined to the local air base on “alert,” ready to fly off at a moment’s notice to support nuclear bombers headed for the Soviet Union. In many ways, this military life fit a traditionally male model of work, even though women were starting to appear on SAC flight crews by the time my father retired.

But the Strategic Air Command’s motto was “Peace is Our Profession,”¹⁵ and that statement quite accurately described what SAC did. Pursuant to the Cold War nuclear doctrine of “mutual assured destruction,” SAC’s job was to deter wars from starting in the first place.¹⁶ And sure enough, from the end of the Vietnam War to my father’s retirement in the late 1980s, the B-52 bombers that Dad supported (he commanded the crew of a tanker designed for mid-air refuelings) dropped no bombs in anger on anyone. Dad’s job—like much of our military—was not to conquer territory or defeat foes, but to prevent the onset of a conflict that could destroy the world. Just like Mom, he was holding back the chaos.

I submit that *most* jobs have this character. With the arguable exception of obstetricians, doctors are not tasked with producing new people but with repairing existing ones, and although some are involved in research that pushes medical science forward, most will spend the majority of their time simply trying to maintain as many people as they can in as healthy a state as possible. Most people in the business world spend most of their time trying to keep a going concern afloat rather than initiating an exciting new start-up or constructing a commercial empire. In the law, most litigators devote their careers to the peaceful resolution of disputes, not the establishment of new rights or the overthrow of oppressive legal regimes. Transaction lawyers may be somewhat more likely to be involved in building something new, but the lawyer’s more specific role in that process is typically to protect the parties’ interests and keep their agreement from unraveling in the future. And prosecutors—like my wife Erin, who left me at home with the diapers—fight the forces of social entropy in a very direct way.

If this is right, then we may do our children a disservice when we exhort them to “change the world.”¹⁷ Most people, most of the time, are tasked with trying to keep the world from changing in a bad way—to keep it from falling apart. To prepare our students to play *that* vital role, we need to teach that feminist ethic of care and maintenance, broadly conceived. We need to tell them that this is not a role you settle for; that it is, rather, a crucially important model of work, of equal

15. See *Strategic Air Command*, WIKIPEDIA, https://en.wikipedia.org/wiki/Strategic_Air_Command (last visited Oct. 27, 2019).

16. See, e.g., JOHN LEWIS GADDIS, *THE COLD WAR: A NEW HISTORY* 80–81 (2005).

17. See, e.g., Tim Cook, Chief Exec. Officer, Apple, Inc., Commencement Address at Tulane University (May 18, 2019), https://www.iphonejd.com/iphone_jd/2019/05/transcript-tim-cook-tulane.html (exhorting graduates “to build a better world”); Bill Nye (the Science Guy), Commencement Address at Goucher College (May 24, 2019) (“[W]e want you to go out there and, dare I say it, change the world.”).

if not greater dignity than that of the innovators and change agents who command the lion's share of our society's attention.

ARE FEMINISTS . . . CONSERVATIVE?!!

Feminists are not the only ones who think this way. (Nor do I mean to suggest that all or even most feminists do.) Philosophical conservatives—who may or may not overlap with the views of right-leaning politicians¹⁸—have long been concerned with preserving existing norms and institutions against the corrosive effects of change. As Michael Oakeshott said, conservatism is “a disposition appropriate to a man who is acutely aware of having something to lose which he has learned to care for.”¹⁹ Appropriately for my subject here, conservatives tend to use family life, with all its mundane rituals and repetition, as a model for politics.²⁰ This politics of preservation is not the stuff of inspirational commencement addresses. Conservatives generally do not draft landmark legislation, overthrow repressive regimes, or propound innovative new theories of government.²¹ They are, not to put too fine a point on it, pretty boring folk.

True conservatives appreciate the value of preservative work. They know that political communities are fragile, and that an institutional equilibrium in which the equality and dignity of persons is at least tolerably well-respected should never be taken for granted. Here is Burke on the fragility of institutional order and the dangers of overly enthusiastic reform:

An ignorant man, who is not fool enough to meddle with his clock, is, however, sufficiently confident to think he can safely take to pieces and put together, at his pleasure, a moral machine of another guise, importance, and complexity, composed of far other wheels and springs and balances and counteracting and cooperating powers. Men little think how immorally they act in rashly meddling with what they do not understand. Their delusive good intention is no sort of excuse for their presumption. They who truly mean well must be fearful of acting ill.²²

Conservatives, in other words, are concerned first with preserving the good in our traditions and institutions before looking to change them for the better; they specialize, like my mother, in holding back the chaos. For conservatives, this

18. See Samuel P. Huntington, *Conservatism as an Ideology*, 51 AM. POL. SCI. REV. 454 (1957); see also Ernest A. Young, *Judicial Activism and Conservative Politics*, 73 U. COLO. L. REV. 1139, 1182–1203 (contrasting different forms of conservatism).

19. MICHAEL OAKESHOTT, *On Being Conservative*, in RATIONALISM IN POLITICS, AND OTHER ESSAYS 169 (1962).

20. See, e.g., Edmund Burke, *Reflections on the Revolution in France*, in 8 THE WRITINGS AND SPEECHES OF EDMUND BURKE: THE FRENCH REVOLUTION, 1790–1794, 53, 84 (L.G. Mitchell & William B. Todd eds., 1990) [hereinafter Burke, *Reflections*] (“[W]e have given to our frame of polity the image of a relation in blood; binding up the constitution of our country with our dearest domestic ties; adopting our fundamental laws into the bosom of our family affections . . .”).

21. See, e.g., *id.* at 137 (“We know that *we* have made no discoveries; and we think that no discoveries are to be made, in morality; nor many in the great principles of government, nor in the ideas of liberty, which were understood long before we were born . . .”).

22. Edmund Burke, *An Appeal from the New to the Old Whigs*, in 4 THE WRITINGS AND SPEECHES, OF EDMUND BURKE 365, 472 (P.J. Marshall & Donald C. Bryant eds., 2015) (1791).

model of work and achievement is not simply a lifestyle choice or a secondary social role. Rather, conservatives sense that the essence of human flourishing is the ongoing effort to both preserve and extend the intergenerational project of building a just society.²³ They focus, in other words, on holding back the chaos.

As conservatives do not often intrude in the pages of this journal, let me quickly add a couple of caveats. It would be hard to be a conservative in a political community that one could not accept as predominantly just—just as it would have been hard for my father to put his life on the line for a nation he could not believe in, or for my mother to care for a family she found unlovable. There have been times in our nation's history when this might be a tough call—in the antebellum republic under a Constitution that protected slavery, for example.²⁴ I believe—but cannot defend within the narrow scope of this Essay—that this is not a hard question in the contemporary United States. It is also important to recognize that finding value in the past and preserving that value does not require one to accept all aspects of that past.²⁵ One might, like my friend and colleague Kate Bartlett, embrace tradition as “an inheritance, upon which a kind of evolutionary pressure is continually exerted, causing past commitments to be amended and reworked, in potentially creative ways.”²⁶ As Dean Bartlett has shown, this sort of conservatism may not simply be compatible with feminism; it may, in fact, be feminism's best way forward.²⁷

Respectful incremental reformism is not what we see on offer from either of our polarized political parties today. In our current political landscape, a passion for change—often grounded more in anger and resentment than in a well-thought-out program for social betterment—has outstripped our sense of the need to preserve and care for our institutions and traditions. I do not mean to praise the sort of reactionary anger that seeks to “take back” our politics from those who have led the country astray. Reaction is another form of radical change, and it often destroys an existing order without recovering the virtues of the one that preceded it. Nor do I mean to deny the need for continuing change and reform in our politics. As Edmund Burke said, “[a] disposition to preserve, and an ability to improve, taken together, would be my standard of a statesman.”²⁸ Good change rarely arises out of chaos.

23. See Anthony Kronman, *Precedent and Tradition*, 99 YALE L.J. 1029, 1065–66 (1990).

24. See, e.g., Sanford Levinson, *Pledging Faith in the Civil Religion; or, Would You Sign the Constitution?*, 29 WM. & MARY L. REV. 113 (1987).

25. Conservatives might even, in some circumstances, find themselves insisting that revolutionary changes that meet the exacting criteria for constitutional amendment must be given full effect. See, e.g., Ernest A. Young, *Dying Constitutionalism and the Fourteenth Amendment*, 102 MARQ. L. REV. 949 (2019) (attributing the Fourteenth Amendment's failure in its early years to a failure to respect entrenched constitutional norms).

26. Katharine T. Bartlett, *Tradition as Past and Present in Substantive Due Process Analysis*, 62 DUKE L.J. 535, 557 (2012).

27. See Katharine T. Bartlett, *Tradition, Change, and the Concept of Progress in Feminist Legal Thought*, 1995 WISC. L. REV. 303, 305 (“Tradition is a key to identifying and reshaping the base of shared understandings on which desirable change, or progress, can build. It is a concept that feminists cannot afford to ignore.”).

28. Burke, *Reflections*, *supra* note 20, at 206. See also Ernest A. Young, *Rediscovering Conservatism: Burkean Political Theory and Constitutional Interpretation*, 72 N.C. L. REV. 619, 653–56 (1994).

If there is validity in this viewpoint, then it is a mistake constantly to emphasize the injustices that remain over the institutions that need preserving, or to exhort young people to a model of work and achievement that emphasizes change over care. The rising generation ought to be, like Oakeshott's conservatively disposed man, "acutely aware of having something to lose." And they should be warned that this vital preservative work will often be unglamorous and even unacknowledged. Perhaps they should be told, as Admiral William McRaven famously told the University of Texas class of 2014 that "if you want to change the world, start off by making your bed."²⁹ But far more important, they should be taught that to preserve the world you were given is often the most important sort of achievement.

CONCLUSION

All this talk of high political theory—in an Essay on paternity leave, no less—might raise a suspicion that your humble author has inhaled too many fumes from the diaper pail. But how we feel about work, and what we count as an accomplishment, go to some of the most basic questions in philosophy and law. This Essay has sought to pursue what Judith Resnik called "the feminist enterprise (and difficult task) of identifying, understanding, reassessing, and reallocating 'housekeeping'—the daily, sometimes powerful, poignant, and compelling, sometimes repetitive and nonengaging, activities that nourish oneself and others."³⁰

The truth is, as parents have always known, that caring for children puts one in touch with life's fundamentals. Our mistake, I fear, has been in tending to assume that those fundamentals are localized in the home and family. It is common to extol family life as ultimately more important and rewarding than the world of work and its standard model of achievement. What is less common, I think, is to see that the distinctive aspects of home work—in particular, its repetitive and preservative nature—actually occur throughout the sphere of work outside the home. Acknowledging this is important both to help those millions of individuals already engaged in this sort of work to value it appropriately, and to help our society more wisely calibrate its relative devotion to preservation and change. There's a lot of chaos out there, and we need to place more value on holding it back.

That, at least, is what I learned on paternity leave.

29. Admiral William H. McRaven, Commencement Address at the University of Texas (May 17, 2014), <https://news.utexas.edu/2014/05/16/mcraven-urges-graduates-to-find-courage-to-change-the-world/>.

30. Resnik, *supra* note 5, at 964.