

March 19, 2017

The Honorable Lamar Alexander  
Chair  
Committee on Health, Education,  
Labor and Pensions  
428 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Patty Murray  
Ranking Member  
Committee on Health, Education,  
Labor and Pensions  
648 Hart Senate Office Building  
Washington, DC 20510

Dear Chairman Alexander and Ranking Member Murray:

We are two former Commissioners of the Bureau of Labor Statistics (BLS), one appointed by President George W. Bush and one appointed by President Barak Obama. We are writing you to ask that you oppose S.J. Res 27, a Congressional Review Act Resolution that repeals an OSHA's injury recordkeeping rule.

The OSHA injury records maintained by employers are the basis for the BLS's Survey of Occupational Injuries and Illnesses (SOII). Statistics from this survey play an important role in setting national workplace safety strategies, and are widely used by employers for benchmarking their own injury experience. Overturning OSHA's rule that requires certain employers with eleven or more employees to keep complete and accurate records of workplace injuries and illnesses will likely have unintended and unfortunate consequences on the integrity of injury data.

In many industries, employers must provide data on their injury rates in competing for contracts. If this legislation passes, responsible employers who accurately record workplace injuries will be at a disadvantage competing with employers who do not maintain accurate records.

It is important to protect the accuracy of employer injury data, and passage of this legislation is likely to result in less accurate data.

Thank you for your consideration.

Kathleen Utgoff, PhD  
Bureau of Labor Statistics Commissioner (2002-2006)

Erica Groshen, PhD  
Bureau of Labor Statistics Commissioner (2013-2017)