

Appendix D

BLS Response to Draft Report


U.S. Department of Labor

Commissioner
Bureau of Labor Statistics
Washington, D.C. 20212



MAR 27 2009

MEMORANDUM FOR: ELLIOT LEWIS
Assistant Inspector General for Audit
Office of the Inspector General

FROM : KEITH HALL 
Commissioner
Bureau of Labor Statistics

SUBJECT : BLS Response to the Office of Inspector General Report
Regarding Strengthening Formal Written Procedures May
Decrease the Possibility of Inconsistencies Occurring in Survey
of Occupational Injuries and Illnesses Data Releases
Draft Audit Report No. 02-09-201-11-001

Thank you for providing the Bureau of Labor Statistics (BLS) with the Office of Inspector General (OIG) Draft Report, *Strengthening Formal Written Procedures May Decrease the Possibility of Inconsistencies Occurring in Survey of Occupational Injuries and Illnesses Data Releases* for the Occupational Safety and Health Statistics program of the BLS. We appreciate the opportunity to provide comments at this time.

As the principal fact-finding agency for the Federal Government in the broad field of labor economics and statistics, the BLS is committed to the integrity and objectivity of our data. The BLS produces impartial, timely, and accurate data relevant to the needs of our users on the social and economic conditions of our Nation, its workers, and their families. As such, the BLS strives to operate effectively and to comply with all Federal regulations and standards. As a leading statistical agency, the BLS is dedicated to implementing the Standards and Guidelines for Statistical Surveys issued by the Office of Management and Budget (OMB).

The Survey of Occupational Injuries and Illnesses (SOII) is a comprehensive statistical program covering work-related injuries and illnesses in private industry, and state and local government. This survey information is unique and of great value to the safety and health community in allocating prevention resources among many diverse industries and occupations, across which workers' risks of injury and illness vary widely. It also provides details on the most severe injuries and illnesses that are critical to designing prevention strategies to protect workers.

By all standards, the SOII program is well managed and produces sound and reliable estimates. Its staff is extremely dedicated and committed to the program and to the BLS. The BLS considers this report to be a confirmation of the sound management practices and survey procedures of the SOII, as there are no findings of lack of compliance with the

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OMB standards, lack of written operating procedures, or warning of impending operational problems. The day-to-day survey operations are well documented and carefully executed to ensure accurate and consistent processing of the data from sampling through estimation and dissemination.

Given these sound practices, the BLS acknowledges the findings in this report, which are based on the fact that the documentation on the historical and theoretical basis of the survey are not gathered into a formal central document repository, and we accept the recommendation. The SOII program will enhance formal documentation and develop a centralized source of information. This documentation will fully incorporate the requirements prescribed by the OMB standards and explain, to the extent practicable, the rationale, methodology, and historical basis of the survey.

I would like to thank you and the audit team for your work and commitment to helping to further us in our mission.