

August 18, 2017

The Honorable R. Alexander Acosta
Secretary, Department of Labor
200 Constitution Ave. NW
Washington, DC 20210

Dear Mr. Secretary,

Congratulations on your appointment. We write to you as strong supporters of the Bureau of Labor Statistics (BLS), the country's second largest federal statistical agency and a major producer of the nation's primary economic indicators. With countless businesses, communities, students, and government policy makers relying on the accuracy, objectivity, and timeliness of statistical information from the BLS, it is imperative that BLS has the resources to do its job effectively and efficiently.

We write today to draw attention to three issues. First, we ask you to prioritize the filling of BLS leadership positions. As many of us wrote President Trump in May, we urge the swift appointment of a BLS commissioner with the necessary credentials. We believe such credentials should include strong management experience, economic and statistical skills, extensive engagement with the federal statistical agencies, familiarity with BLS and an understanding of its products and broader relevance, visibility in the statistical community, an ability to interact effectively with both Congress and senior Department of Labor staff, and a thorough understanding of the National Academies' *Principles and Practices for a Federal Statistical Agency*.

Furthermore, according to the BLS senior staff website, BLS has two vacant positions at SES level: Associate Commissioner for Survey Methods Research and Assistant Commissioner for Occupational Safety and Health Statistics. We respectfully urge these positions be filled in as timely a manner as possible.

Second, as a related matter, we are concerned about the Department's recent decision to inform participants in the Pathways program that BLS would not be allowed to convert their Pathways positions to permanent positions. Our concerns are two-fold. The Pathways program is an important recruitment and training program for BLS, which must compete with private sector employers who generally pay a higher salary. An apprentice-like program, it allows BLS to groom and vet potential employees while also offering its participants in-demand job skills. It helps attract the best and brightest graduates to BLS.

Disallowing conversions from the Pathways program to permanent positions squanders not only the investment of time and taxpayer resources, it also forces BLS to start from scratch in training and recruiting other job candidates and to reorganize production to cope with unexpected vacancies.

Our additional concern regarding the Pathways terminations is that it could readily be perceived as micromanagement of BLS by the Department. (We understand Pathways is Federal government program but that BLS is an extensive user in DOL.) The Department's interjection on this personnel program puts DOL leadership at risk of being perceived as interfering with BLS independence as a federal statistical agency. This independence is vital to BLS data being widely regarded as objective and credible. Let us therefore ask you to maintain the independence for the BLS, as have your Labor Secretary predecessors over many decades. We refer you to OMB Statistical Policy Directive #1 and the *Principles and Practices of a Federal Statistical Agency*.

To emphasize the importance of personnel issues to an agency's independence, we share the following language from Statistical Policy Directive #1 where, under "*Responsibility 3: Conduct objective statistical activities*", it states,

Specifically, Federal statistical agencies and recognized statistical units must be able to conduct statistical activities autonomously when determining ... which staff to select to join their agencies... Federal statistical agencies and recognized statistical units must maintain and develop in-house staff who are trained in statistical methodology to properly plan, design, and implement core data collection operations and to accurately analyze their data.

The just-released *Principles and Practices of a Federal Statistical Agency* (sixth edition) states, under Practice 2: Necessary Authority to Protect Independence, "Another important aspect of independence is control over personnel actions, especially the selection of qualified professional staff, including senior executive career staff."

With your tenure as Secretary of Labor just beginning, let us highlight the critically important products that BLS provides:

- Jobs outlook, upon which employers, job seekers, and students base their training, participation, and other labor market decisions;
- Consumer Price Index, which tracks inflation and informs monetary policy;
- Employment and unemployment rates at the national, state and local levels, which serve as the most timely and accurate indicators of economic activity;

- Measures of productivity that gauge our nation's economic performance; and
- Monthly data on changes in the prices of imported and exported goods traded between the U.S. and the rest of the world, which help track trends in international competitiveness.

Third, we want to take the opportunity to urge appropriate funding levels for the Bureau as you develop the FY19 budget. BLS has been flat funded since FY2010, resulting in a 14% cut to its purchasing power due to inflation. We urge that you prioritize and work to ensure that BLS funding returns to levels sufficient to cover its varied and vital statistical programs.

Thank you for your consideration. We would appreciate the opportunity to meet with you regarding the BLS and how we can support the Department's efforts to sustain and support BLS's work so vital to families, government, students, workers, and policymakers. The staff contact for this letter is Steve Pierson, Director of Science Policy for the American Statistical Association (pierson@amstat.org; 703.302.1841.)

American Association for Public Opinion Research
American Statistical Association
Association for University Business and Economics Research
Association of Population Centers
Association of Public Data Users
Center for Data Innovation
Consortium of Social Science Associations
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National Association for Business Economics
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