

Inspections Reported By OSHA Have Fallen Dramatically Since Coronavirus Was Declared A National Emergency And OSHA Citations Have Dropped Almost 70-Percent Under Labor Secretary Eugene Scalia, Even As Thousands Of Workers Have Complained To The Agency About Exposure To The Pandemic

Executive Summary

Since long before he was Labor Secretary, Eugene Scalia has been skeptical of the role the federal government and OSHA play in workplace safety. As a corporate lawyer, Scalia once [wrote](#) that the government does not have “the sole-or even primary-role In furthering occupational safety and health or compliance with the employment law.

But during the COVID19 crisis, Eugene Scalia has overseen OSHA, the agency responsible for enforcing those occupational safety and health laws – and he appears to have not been up to the job. Thus far, Scalia’s OSHA has [declined](#) to issue emergency temporary standards to keep workers safe, instead relying on employers to investigate COVID19 issues.

Furthermore, since the beginning of 2020, it appears that just 1.2% of all OSHA-reported inspections have been associated with COVID19 (out of 17,698 total) despite reports that the agency has received “thousands of complaints regarding [workers’] exposure to the novel coronavirus and a lack of safeguards at their places of employment.” Additionally, since COVID19 was declared a national emergency, the number of daily inspections conducted or overseen by OSHA has fallen dramatically, from an average of 217 per day before the crisis, to just 60 per day since the national emergency was declared.

As the Trump administration [pushes](#) for states to “re-open” schools and workplaces, will Americans feel confident knowing that if they do complain about safety issues related to COVID19, the chief workplace safety organization may only be able to manage sixty inspections a day across the entire country?

Only 1.22% Of Inspections Reported By OSHA Since The Beginning Of The Year—When WHO Began An “Emergency Footing” For Coronavirus—Have Been Associated With COVID-19 According To The Agency’s Public Data.

The World Health Organization (WHO) Was “On An Emergency Footing” For Coronavirus As Early At January 1, 2020.

On January 1, 2020, The World Health Organization (WHO) Set Up An Incident Management Support Team To Get “On An Emergency Footing” For The Coronavirus Outbreak. [[“WHO Timeline - COVID-19,”](#) World Health Organization, 04/27/20]

OSHA Registered 17,698 Inspections From January 2, 2020 To April 23, 2020.

17,698 Inspections Were Conducted By OSHA Or Under OSHA-Approved State Plans From January 2, 2020 To April 23, 2020. [“osha_inspection4.csv” file in “osha_inspection” dataset at [“OSHA Enforcement Data,”](#) U.S. Department of Labor, accessed 04/29/20]

- **The Earliest Of These Was Opened On January 2, 2020.** [“osha_inspection4.csv” file in “osha_inspection” dataset at “[OSHA Enforcement Data](#),” U.S. Department of Labor, accessed 04/29/20]
- **The Latest Of These Was Opened On April 23, 2020.** [“osha_inspection4.csv” file in “osha_inspection” dataset at “[OSHA Enforcement Data](#),” U.S. Department of Labor, accessed 04/29/20]

OSHA Data Has Publicly Linked Only 216, Or 1.22%, Of These Inspections With COVID-19.

OSHA Has Tagged Only 216 Of These 17,698 Inspections With “COVID-19” In A Dataset Where It Detailed Additional Information About Inspections. [“osha_optional_info1.csv” file in “osha_optional_info” at “[OSHA Enforcement Data](#),” U.S. Department of Labor, accessed 04/27/20]

- **OSHA’s Optional Information Table Includes “Additional, Optional Information Associated With An OSHA Inspection.”** “The following table provides additional, optional information associated with an OSHA inspection. The information is linked to OSHA inspection reports found in the osha_inspection table.” [“[DOL OSHA Enforcement](#),” U.S. Department of Labor, accessed 04/29/20]

216 Is .0122 Of 17,698. [[Search for 216 / 17,698](#), Google, accessed 04/29/20]

Of The 216 Inspections Tagged With The COVID-19 Indicator, 121 Inspections May Not Have Even Been Conducted By Federal Inspectors As They Took Place At Facilities Likely Covered By “State Plans.”

According To The Department Of Labor (DOL), There Are “Approximately 90,000 OSHA Inspections Conducted Annually.”

According To The Department Of Labor, There Are “Approximately 90,000 OSHA Inspections Conducted Annually.” “The dataset consists of inspection case detail for approximately 90,000 OSHA inspections conducted annually.” [“[OSHA Enforcement](#),” U.S. Department of Labor, 04/29/20]

While Many Of These Inspections Are Conducted By States Under “State Plans,” They Are Still Overseen By OSHA And Employers Must Still Directly Report To The Secretary Of Labor.

OSHA Presides Over “State Plans,” Through Which The Agency Monitors State-Level OSHA Enforcement, Which Must Be “At Least As Effective As OSHA.” “State Plans are OSHA-approved workplace safety and health programs operated by individual states or U.S. territories. There are currently 22 State Plans covering both private sector and state and local government workers, and there are six State Plans covering only state and local government workers. State Plans are monitored by OSHA and must be at least as effective as OSHA in protecting workers and in preventing work-related injuries, illnesses and deaths.” [[State Plans](#), U.S. Department of Labor, 04/29/20]

While A Large Percentage Of OSHA Inspections Are Conducted Under State Plans, Employers Must Report To The Secretary Of Labor “In The Same Manner And To The Same Extent” As They Would Without A State Plan. “FY 2018 total federal inspections: 32,020 [...] FY 2018 total State Plan inspections: 40,993” [“[Commonly Used Statistics](#),” U.S. Department of Labor, accessed 04/29/20]

- **A State Plan Is Only Legal Under Federal Law If It “Requires Employers In The State To Make Reports To The Secretary [Of Labor] In The Same Manner And To The Same Extent As If The Plan Were Not In Effect [...]”** “Specifically, Section 18(c) of the OSH Act requires OSHA to approve a state plan if the plan [...] Requires Employers In The State To Make Reports To The Secretary [Of Labor] In The Same Manner And To The Same Extent As If The Plan Were Not In Effect [...]” [[“OSHA State Plans: In Brief, with Examples from California and Arizona,”](#) Congressional Research Service, 04/18/17]

121 Of the 216 Cases Tagged “COVID-19” Were In States Or Locations Likely Covered By State Plans.

Of The 216 Cases Within The OSHA Dataset Tagged “COVID-19,” 95 Cases Took Place In States Or Locations That Appear To Be Covered By Federal OSHA Inspectors. [“osha_optional_info1.csv” file in “osha_optional_info” at [“OSHA Enforcement Data,”](#) U.S. Department of Labor, accessed 04/27/20]

Of The 216 Cases Within The OSHA Dataset Tagged “COVID-19,” 121 Cases Took Place In States Or Locations That Appear To Be Covered By OSHA-Approved State Plans. [“osha_optional_info1.csv” file in “osha_optional_info” at [“OSHA Enforcement Data,”](#) U.S. Department of Labor, accessed 04/27/20]

Nationally, The OSHA Inspection Rate Has Fallen Dramatically From 217 A Day To 60 A Day Since Coronavirus Was Declared A National Emergency.

15,199 Of The 17,698 OSHA Inspections In 2020 Were Before Coronavirus Was Declared A National Emergency; 2,499 Have Occurred Since The Declaration.

There Were 15,199 Inspections Opened Between January 2, 2020 March 12, 2020.

[“osha_inspection4.csv” file in “osha_inspection” dataset at [“OSHA Enforcement Data,”](#) U.S. Department of Labor, accessed 04/29/20]

- **The Coronavirus Outbreak Was Declared A National Emergency On March 13, 2020.** [[“Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease \(COVID-19\) Outbreak,”](#) The White House, 03/13/20]

There Were 2,499 Inspections Opened Between March 13, 2020 And April 23, 2020.

[“osha_inspection4.csv” file in “osha_inspection” dataset at [“OSHA Enforcement Data,”](#) U.S. Department of Labor, accessed 04/29/20]

Before The Emergency Declaration, OSHA And OSHA-Approved State Plans Were Conducting Inspections At A Rate Of 217 A Day; After The Declaration, The Rate Was 60 A Day.

There Were 70 days Between January 2, 2020 And March 12, 2020. [[Query](#), Google, accessed 04/27/20]

OSHA’s 15,199 Inspections During This Period Were Conducted At An Average Rate Of 217 A Day. [[Search for 15,199 / 70](#), Google, accessed 04/27/20]

There Were 41 Days Between March 13, 2020 And April 23, 2020. [[Query](#), Google, accessed 04/27/20]

OSHA’s 2,499 Inspections During This Period Were Conducted At An Average Rate Of 60 A Day. [[Search for 2,499 / 41](#), Google, accessed 04/27/20]

OSHA Citations Have Fallen By Almost 70-Percent Since Coronavirus Was Declared A National Emergency—Compared To The Same Timeframes In 2019 And 2018—Despite Thousands Of Worker Complaints About Unsafe Workplaces Amidst The Pandemic.

The Occupational Safety And Health Administration (OSHA) Has Issued Only 4,621 Citations Since Coronavirus Was Declared A National Emergency, Falling 67% From A Comparable Period In 2019 And 68% From A Comparable Period In 2018.

OSHA Issues Citations To Employers Who Violate Workplace Safety Law. “An OSHA compliance safety and health officer (CSHO) conducts an inspection of your workplace, in accordance with the OSH Act. After the inspection, the CSHO reports the findings to the OSHA area director who evaluates them. If a violation exists, OSHA will issue you a Citation and Notification of Penalty detailing the exact nature of the violation(s) and any associated penalties. A citation informs you of the alleged violation, sets a proposed time period within which to correct the violation, and proposes the appropriate dollar penalties.” [[“Employer Rights and Responsibilities,”](#) Occupational Safety And Health Administration, 04/21/20]

From March 13, 2020 to April 10, 2020, The U.S. Department Of Labor’s (DOL’s) Occupational Safety And Health Administration (OSHA) Issued 4,621 Citations, According to OSHA Data As Of April 19, 2020. [[“osha_violation12.csv,”](#) U.S. Department of Labor, downloaded 04/19/20]

- **The Coronavirus Outbreak Was Declared A National Emergency On March 13, 2020.** [[“Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease \(COVID-19\) Outbreak,”](#) The White House, 03/13/20]

From March 13, 2019 To April 10, 2019, OSHA Issued 14,258 Citations, 67.6% Higher Than The Same Period In 2020, According to OSHA Data As Of April 19, 2020. [[“osha_violation12.csv,”](#) U.S. Department of Labor, downloaded 04/19/20]

- **2020’s 4,621 OSHA Citations Is 32.4% Of Its 14,258 Citations In 2019.** [[Search for 4,621 / 14,258,](#) Google, 04/24/20]

From March 13, 2018 To April 10, 2018, OSHA Issued 14,408 Citations, 68% Higher Than The Same Period In 2020, According to OSHA Data As Of April 19, 2020. [[“osha_violation12.csv,”](#) U.S. Department of Labor, downloaded 04/19/20]

- **2020’s 4,621 OSHA Citations Is 32.1% Of Its 14,408 Citations In 2018.** [[Search for 4,621 / 14,408,](#) Google, 04/24/20]

**The Figures Above Reflect OSHA Data Available As Of April 19, 2020.*

Meanwhile, Workers Have Filed Thousands Of Complaints To OSHA Complaining About Unsafe Workplaces That Increase Their Exposure To The Virus.

Workers Have Filed “Thousands Of Complaints Regarding Their Exposure To The Novel Coronavirus And A Lack Of Safeguards At Their Places Of Employment.” “People working during the pandemic have filed thousands of complaints regarding their exposure to the novel coronavirus and a lack of safeguards at their places of employment, according to records obtained under a Freedom of Information request and reviewed by The Washington Post.” [Peter Whoriskey, Jeff Stein and Nate Jones, [“Thousands of OSHA](#)

[complaints filed against companies for virus workplace safety concerns, records show,](#)” *The Washington Post*, 04/16/20]

According To OSHA Records, Workers Filed More Than 3,000 Complaints Between January And Early April Of 2020, And It Is Unclear What Actions The Agency Took To Address Them. “Citing the Freedom of Information Act, The Post requested all worker complaints regarding the coronavirus filed with the Occupational Safety and Health Administration from January through early April. There were more than 3,000 such complaints filed. The records do not state what actions were taken as a result.” [Peter Whoriskey, Jeff Stein and Nate Jones, “[Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,](#)” *The Washington Post*, 04/16/20]

- **The Actual Number Of Worker Complaints “Is Probably Far Higher Because That Data Does Not Include The Complaints From Every State.”** “The actual number of complaints from employees about the coronavirus, however, is probably far higher because that data does not include the complaints from every state.” [Peter Whoriskey, Jeff Stein and Nate Jones, “[Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,](#)” *The Washington Post*, 04/16/20]

The Workers’ Complaints Reflect “Shortages Of Masks And Gloves, Of Being Forced To Work With People Who Appear Sick, And Of Operating In Cramped Work Areas That Prevent Them From Standing Six Feet From One Another.” [Peter Whoriskey, Jeff Stein and Nate Jones, “[Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,](#)” *The Washington Post*, 04/16/20]

The Complaints Come From A Wide Variety Of Workers In “Hospitals, Airlines, Construction Companies, Call Centers, Grocery Stores, Beauty Spas, Pharmacies And Shipping Companies, Among Others.” “The employee complaints offer a snapshot of the fear experienced by the Americans compelled to work while the majority have been urged to stay at home, and they arise from an array of workplaces: hospitals, airlines, construction companies, call centers, grocery stores, beauty spas, pharmacies and shipping companies, among others.” [Peter Whoriskey, Jeff Stein and Nate Jones, “[Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,](#)” *The Washington Post*, 04/16/20]

Labor Secretary Eugene Scalia Has So Far “Declined” To Follow CDC Recommendations To Issue Coronavirus Safety Rules And OSHA Has So Far Only Issued A Non-Binding “Booklet With Suggestions” For Employers To Follow.

As Of April 23, 2020, OSHA And The Trump Labor Department Has Yet To Follow The Centers For Disease Control’s (CDC’s) Recommendations To Require Workplace Coronavirus Safety Standards.

Despite Pleas From Workers’ Groups, The Trump Labor Department Has “Declined” To “Enact Rules Requiring Employers To Follow The Centers For Disease Control And Prevention’s Safety Guidelines For Employers.” “Democrats and workers’ groups have pressed the Trump administration to enact rules requiring employers to follow the Centers for Disease Control and Prevention’s safety guidelines for employers. The Labor Department has declined to do so, instead giving advice to employers that is not legally binding.” [Peter Whoriskey, Jeff Stein and Nate Jones, “[Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,](#)” *The Washington Post*, 04/16/20]

- **“OSHA Is Part Of The United States Department Of Labor.”** “OSHA is part of the United States Department of Labor. The administrator for OSHA is the Assistant Secretary of Labor for Occupational Safety and Health. OSHA’s administrator answers to the Secretary of Labor, who is a member of the cabinet of the President of the United States.” [“[About OSHA,](#)” U.S. Department of Labor, accessed 04/21/20]

As Of April 23, 2020, OSHA Has Only Issued A “Booklet With Suggestions” On Coronavirus Safety Standards For Employers, With The Agency Clarifying “This Guidance Is Not A Standard Or Regulation, And It Creates No New Legal Obligations.”

“OSHA Has Yet To Issue A Specific Coronavirus Standard For Employers That Would Protect Many ‘Essential’ Workers,” Although Congress And Labor Unions Have Pressed The Agency For A Meaningful Standard. “Despite requests from unions and members of Congress, OSHA has yet to issue a specific coronavirus standard for employers that would protect many ‘essential’ workers, leaving employers to come up with their own ways of trying to meet health guidelines.” [Peter Whoriskey, Jeff Stein and Nate Jones, [“Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,”](#) *The Washington Post*, 04/16/20]

In Early March 2020, OSHA Issued A “Booklet With Suggestions” Of Coronavirus Precautions For Employers, But The Agency Specifically Stated ““This Guidance Is Not A Standard Or Regulation, And It Creates No New Legal Obligations.”” “In early March, OSHA issued a 35-page booklet with suggestions for what employers ought to do to protect employees: The documents tells them to ‘promote frequent and thorough hand-washing,’ ‘encourage respiratory etiquette, including covering coughs and sneezes’ and ‘provide customers and the public with tissues.’ It further recommends that when the virus is present in an area, employers should ‘consider offering face masks to ill employees and customers’ and that health-care workers dealing with sick patients ‘should wear respirators.’ But the booklet notes that these precautions are not legal requirements. ‘This guidance is not a standard or regulation, and it creates no new legal obligations,’ the booklet begins. Instead, it points to general requirements for personal protective equipment and an employer’s ‘general duty’ to maintain safe workplaces.” [Peter Whoriskey, Jeff Stein and Nate Jones, [“Thousands of OSHA complaints filed against companies for virus workplace safety concerns, records show,”](#) *The Washington Post*, 04/16/20]

While A Corporate Lawyer, Labor Secretary Eugene Scalia Has Argued That The Government Does Not Have “The Sole-Or Even Primary-Role In Furthering Occupational Safety And Health Or Compliance With The Employment Laws [...]”

The DOL’s Occupational Health And Safety Administration (OSHA) Is Responsible For Protecting Workers From Unsafe Work Environments.

DOL’s Occupational Safety And Health Administration (OSHA) Enforces Workplace Safety And Health Standards. “The Occupational Safety and Health Administration primarily administers and enforces the Occupational Safety and Health Act (OSH Act; P.L. 91-596), which provides health and safety standards for workplaces and authorizes DOL to provide assistance and sanctions to enforce compliance.” [[“Major Functions of the U.S. Department of Labor,”](#) Congressional Research Service, 09/07/18]

Eugene Scalia Wrote That The Government Does Not Have “The Sole-Or Even Primary-Role In Furthering Occupational Safety And Health Or Compliance With The Employment Laws [...]”

While A Partner At Gibson Dunn, Eugene Scalia Wrote A Law Review Article On “Inspection And Enforcement Strategies In Labor And Employment Law,” With A Focus On The Occupational Safety And Health Administration (OSHA). “The subject of this Essay is inspection and enforcement strategies in labor and employment law, with particular focus on the Occupational Safety and Health Administration (OSHA). I approach the subject from two somewhat different perspectives, having been a private practitioner

representing clients being investigated and prosecuted by OSHA, and having also served as Solicitor of Labor, with OSHA as one of my clients and with responsibility myself for prosecuting OSHA cases.” [Eugene Scalia, [“Inspection and Enforcement Strategies at the U.S. Department of Labor,”](#) *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

- **Eugene Scalia Was A Partner At Gibson, Dunn & Crutcher LLP At The Time.** “Eugene Scalia is a partner in the Washington, D.C. office of Gibson, Dunn & Crutcher LLP. He is co-chair of the firm's Labor and Employment Practice Group and a member of the firm's Appellate and Constitutional Law Practice Group.” [Eugene Scalia, [“Inspection and Enforcement Strategies at the U.S. Department of Labor,”](#) *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Eugene Scalia Wrote, “The Government Does Not Have The Sole-Or Even Primary-Role In Furthering Occupational Safety And Health Or Compliance With The Employment Laws,” Arguing That It Is Primarily Left To Employers And Employees. ““The government does not have the sole-or even primary-role in furthering occupational safety and health or compliance with the employment laws generally. Others with those responsibilities include employers and employees, individually and collectively through their labor unions.” [Eugene Scalia, [“Inspection and Enforcement Strategies at the U.S. Department of Labor,”](#) *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Eugene Scalia Argued That In Lieu Of Government Oversight, “Unions Are Among The Most Effective Advocates For Workplace Safety.” “Unions are among the most effective advocates for workplace safety. In unionized workplaces on a daily basis, unions play an important role in identifying and addressing occupational hazards. When necessary-and at times when not necessary-unions contact OSHA to complain and trigger inspections. So, the question arises, as the government sets its inspection and enforcement priorities, what consideration should be given the fact of union representation at a worksite?” [Eugene Scalia, [“Inspection and Enforcement Strategies at the U.S. Department of Labor,”](#) *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Eugene Scalia Has Argued That “OSHA's [Occupational Safety And Health Administration’s] Inspection Authority Was Openly Used As A Form Of Coercion” And “An Imposition Of Government Power” Under A 1998 Program In Which OSHA Tried To Increase Accountability For Workplaces With High Rates Of Worker Injury.

Eugene Scalia Wrote, “OSHA's Inspection Authority Was Openly Used As A Form Of Coercion” Under A 1998 Program In Which The Agency Told Employers They Could Either Adhere To Additional Safety Requirements Or Face Increased Inspections. “The most notable example of this approach is a 1998 OSHA program called the ‘Cooperative Compliance Program.’ Under the program, employers with high reported injury rates were told they had been selected for onerous comprehensive ‘wall-to-wall’ inspections. But, they were advised, we will greatly reduce the likelihood of inspection-and any inspections that do occur will be relatively benign-if you agree to do a series of things currently not required by federal law. Under this program, which was invalidated by the D.C. Circuit, OSHA's inspection authority was openly used as a form of coercion to prompt employers to do things that, at the time, OSHA did not have the authority to require.” [Eugene Scalia, [“Inspection and Enforcement Strategies at the U.S. Department of Labor,”](#) *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Eugene Scalia Called OSHA Inspections “An Imposition Of Government Power That Causes A Company To Change Its Practices Even Though The Law Does Not Require That It Do So.” “Another (perhaps related) view is that inspection itself is a form of enforcement, in the sense that it is an imposition of government power that causes a company to change its practices even though the law does not require that it do so.” [Eugene Scalia, [“Inspection and Enforcement Strategies at the U.S. Department of Labor,”](#) *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Eugene Scalia Argued That During Unannounced OSHA Inspections, The Government “Comes Uninvited To Private Property.” “The third view of the purpose of inspections-which is my view, the most common view, and the view that coincides with the Fourth Amendment-is that they are for investigative and enforcement purposes only. OSHA has separate consultation and compliance assistance programs to show employers how to improve workplace safety. But when it comes uninvited to private property, the government has a right of access only when it has probable cause to believe that a violation of a law enforceable by that agency has occurred.” [Eugene Scalia, “[Inspection and Enforcement Strategies at the U.S. Department of Labor](#),” *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Despite These Arguments, Eugene Scalia Admitted That In OSHA Inspections, “Probable Cause Is Defined Somewhat Loosely.” “In administrative inspection schemes, probable cause is defined somewhat loosely-but the justification for government entry remains the search for a prosecutable violation of the law.” [Eugene Scalia, “[Inspection and Enforcement Strategies at the U.S. Department of Labor](#),” *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Scalia Has Also Likened OSHA Inspectors To Ronald Reagan’s “Nine Most Terrifying Words In The English Language.”

Eugene Scalia Invoked An Anti-Government Quote From Ronald Reagan—“The Nine Most Terrifying Words In The English Language Are: I’m From The Government, And I’m Here To Help.”—When Discussing OSHA Inspections.

Eugene Scalia Said That OSHA Inspections Were Based On A Philosophy Of “We’re The Government And We’re Here To Help.” “For instance, OSHA inspections may be viewed as a sort of house-call for troubled employers: federally funded corporate consulting intended less to effect compliance with the law and more to help employers find ways to address hazards regardless of whether those hazards violate federal law. Call this approach, ‘We’re the government and we’re here to help.’ Under this view, it does not matter whether violations are found on an OSHA inspection, as long as there has been a chance for the government to reach out and touch an employer.” [Eugene Scalia, “[Inspection and Enforcement Strategies at the U.S. Department of Labor](#),” *University of Pennsylvania Journal of Labor & Employment Law*, Spring 2005]

Ronald Reagan Once Said, “The Nine Most Terrifying Words In The English Language Are: I’m From The Government, And I’m Here To Help.” [“[August 12, 1986 Reagan Quotes and Speeches](#),” Ronald Reagan Presidential Foundation & Institute, accessed 07/24/19]