



VIA ELECTRONIC SUBMISSION

Office of Policy Development and Research
Employment and Training Administration
Department of Labor
Room N-5641
200 Constitution Ave. NW
Washington, DC 20210

September 22, 2019

**RE: Agency Information Collection Activities; Comment Request; National
Agricultural Workers Survey**

Dear Mr. Carroll:

Farmworker Justice and the undersigned organizations submit these comments in strong support of the continuation of the Department of Labor's National Agricultural Workers Survey (NAWS) and the publication of periodic reports based on the NAWS.

Farmworker Justice (FJ) is a national farmworker advocacy organization. We seek to improve the working and living conditions of farmworkers and their families in the United States and promote their access to health care. Our organization engages in substantial education of farmworker-serving organizations, the public, the media, academics and government officials regarding farmworkers and their family members. The NAWS has been and continues to be a valuable and unique source of information for the work of our organization. For these reasons Farmworker Justice, and many other organizations, holds a strong interest in the NAWS data and the Department's reports based on that data. The other signatories to these comments are organizations that provide legal and other services to farmworkers and represent or serve clients who have an interest in ensuring that the NAWS survey is accurately completed.

It is important to have national level data on U.S. farmworkers to ensure the development of evidence-based policies and programs. The NAWS provides the most comprehensive data

available on U.S. farmworkers and their families. It is unique because it is the only national, government-sponsored survey of crop workers in the U.S. No other survey provides the demographic and economic information provided by the NAWS. That information is used for many purposes and by many individuals and organizations. Because the NAWS shares information with other federal agencies that recognize its usefulness, a breadth of data is collected from employment status to housing characteristics to health care utilization. FJ, farmworker-serving organizations, and many others regularly refer to NAWS data to understand demographic trends, inform policy advocacy, and develop community projects.

The value of the NAWS derives in part from its attention to the characteristics of farmworkers and family members in its approach to its survey processes. Interviews are done directly with workers, who often live in rural areas and do not speak English well, and are conducted throughout the year to capture the seasonality of agricultural work.

We recommend that DOL clarify the definition of health insurance provided by the government. The NAWS survey includes a question about worker, spouse, and child enrollment in government health insurance. While government health insurance is most likely defined as Medicaid or Medicare, it can also include CHIP (Children's Health Insurance Program), state and local-sponsored health insurance programs as well as health insurance subsidized by Affordable Care Act tax credits. The availability of more detailed data about the type of government-sponsored health insurance used by farmworkers and their families can inform the development of outreach and enrollment programs as well as policy to increase farmworker access to health insurance.

We also encourage DOL to seek input from farmworkers, farmworker advocates, and farmworker-serving organizations when developing future NAWS surveys. These stakeholders can provide important insight about the quality and clarity of questions to ensure maximum utility of the data collected.

In conclusion, we strongly support DOL's extension of the NAWS. It provides important data on U.S. farmworker demographics and trends. We appreciate the opportunity to share the value of the NAWS and recommendations to enhance its quality and utility.

Sincerely,
Farmworker Justice

Legal Aid Society of Metropolitan Family Services
New Mexico Legal Aid Centro Legal Campesino
Texas RioGrande Legal Aid, Inc.
Northwest Forest Worker Center