



November 1, 2021

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

*Via Electronic Submission*

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

Dear Mr. Carroll,

Farmworker Justice (FJ) submits these comments to express our strong support for the continuation of the National Agricultural Workers Survey (NAWS) with the inclusion of supplemental questions on COVID-19. FJ is a national farmworker advocacy organization based in Washington, DC. We seek to improve the working conditions, occupational safety and health, and access to health care of farmworkers and their families.

FJ and other farmworker-serving and advocacy organizations, as well as media, academics, and government officials, hold a strong interest in the NAWS data and the Department's reports based on that data. As the only national, government-sponsored survey of U.S. crop workers, the NAWS continues to be a valuable and unique source of demographic, labor, and health information of U.S. farmworkers and their families. We and others regularly refer to NAWS data to understand demographic trends among farmworkers, inform policy advocacy, educate the public and stakeholders, and develop effective community projects.

We support the inclusion of the supplemental questions to gather information related to the COVID-19 pandemic. Farmworkers, who are designated "essential workers," and their family members have been affected substantially by the pandemic but there is inadequate information about its effects on farmworker families. There is no comprehensive national data regarding COVID-19 and farmworkers. The COVID-19 public health data collected and published by CDC, health departments, and federally qualified health centers does not include any details on

occupation. Other publicly-available figures, particularly the Purdue University Food and Agriculture Vulnerability Index, are merely estimates based on the compilation of disparate data sources. The COVID-19 Farmworker Study (COFS) conducted in California, Oregon, and Washington is perhaps the most comprehensive information available on the impact of COVID-19 in farmworker communities, but the data collected is state-specific and limited in its scope.

The NAWS presents a unique opportunity to collect information specific to the impact of COVID-19 on farmworker employment and health. The questions to be included in the NAWS will provide important insights on the prevalence of COVID-19 in agricultural workplaces, the extent of mitigation measures in agricultural workplaces, and vaccination rates and attitudes among farmworkers. In addition to the questions proposed in the notice, we recommend the addition of the following questions:

- Whether the respondent had sick leave available from their employer if diagnosed with COVID-19 or caring for a family member with COVID-19.
- If vaccinated, where the respondent received the vaccine (i.e. health clinic, at the worksite, community vaccination event).
- What safety and health protocols were implemented at the respondents' worksite (i.e. masks, social distancing, handwashing stations, quarantine, etc.).
- Whether COVID-19 safety and health protocols in the respondents' workplace have changed during the course of the pandemic.

We also recommend that the survey extend some of the proposed COVID-19 questions to consider family and household members by, for example, asking about the vaccination status of family or household members and whether others in their family or household have been diagnosed with COVID-19.

In conclusion, we strongly support continuation of the NAWS and the inclusion of COVID-19 supplemental questions. Although the pandemic may have subsided by the time the COVID-19 supplemental data is released, the health and economic effects on farmworker families may continue. In addition, information gathered through these supplemental questions will help inform efforts to protect farmworkers during future public health emergencies.

We appreciate the opportunity to provide feedback and enhance the quality and utility of NAWS data.

Sincerely,



Alexis Guild

Director of Health Policy and Programs  
Farmworker Justice