

September 27, 2021

Office of Policy Development and Research  
Attn: Daniel Carroll  
Employment and Training Administration  
U.S. Department of Labor 200 Constitution Avenue NW  
Washington, DC 20210

RE: Federal Register notice of September 3, 2021 for the National Agricultural Workers Survey (OMB Number: 1205-0453)

Dear Mr. Carroll:

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the U.S. Department of Labor for the National Agricultural Workers Survey. This survey is our main data source for key components of BEA's economic statistics.

Data from the National Agricultural Workers Survey (NAWS) have been used since 1997 by the BEA to estimate the U.S. international transactions accounts and gross domestic income. Specifically, BEA estimates compensation of unauthorized migrant agricultural workers using the following variables: the percentage of farm workers that are migratory; the percentage of these migratory workers who are unauthorized; the average number of weeks worked per year by these migratory workers; and their average hours worked per week. Also, the number of unauthorized migrant workers, who are calculated in this methodology, is important to our estimate of the compensation of unauthorized nonagricultural workers.

The compensation of unauthorized migrant workers accounts for over 50 percent of our estimate of compensation of seasonal employees and about 13 percent of total compensation of employees in the international transaction accounts. Payments for the compensation of foreign-resident employees amounted to \$14.4 billion in 2020. These payments are part of total payments to the rest of the world, an important component in the estimation of gross domestic income.

These data are not obtainable elsewhere and are indispensable to our estimates. Our compensation estimates compose an ongoing time series. The reported ongoing decline of undocumented immigrant workers in the United States make the continual updating of our data vitally important. The data used and how they are used by BEA can be found in the attachment.

Please keep BEA informed concerning any modifications to this form. We are particularly interested in any modifications proposed during the form's approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on 301-278-9618 or by e-mail at [Tiffany.Burrell@bea.gov](mailto:Tiffany.Burrell@bea.gov). Should you need assistance in justifying this form to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

Dennis J. Fixler  
Chief Economist

Attachment

**Attachment**  
BEA's Use of the National Agricultural Workers Survey

Data Component Used:	Used to Estimate:
Total Number of Farm Workers  and  Average Number of Hours Per Week	Compensation of Employees Table 1.1, Line 15 Table 1.2, Line 63 Table 4.1, Line 42  Expenditures of Short-term Workers Table 3.1, Line 15 Travel: Table 1.2, Line 17