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Submitter Information

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Organization: VFF (Vulgamore Family Farms)

General Comment

See attached file(s)

Attachments

FLS comments

May 6, 2024
Mr. Richard Hopper
NASS Clearance Officer
U.S. Department of Agriculture,
1400 Independence Avenue SW,
Room 5336, South Building Washington, D.C. 20250–2024



Dear Mr. Hopper:

We are Vulgamore Family Farms, a multi-family farm based in Western Kansas. We would like to express our appreciation for the opportunity to provide input on the National Agricultural Statistics Service's Farm Labor Survey (FLS).

The FLS plays a significant role in shaping agricultural policies, H-2A labor regulations, and workforce development strategies. Unfortunately, we find the survey does not adequately align with the dynamics of our operation. One primary deficiency is the absence of tailored questions addressing cash vs non-cash compensation for our employees such as housing, meals, beef, vehicles to drive, medical insurance, workers compensation, 401K, death benefits, phantom stock, etc. Right or wrong, we dollar up all of these non-cash benefits and add them to the total compensation reported on the FLS.

The survey also lacked inquiries into whether the adverse effective wage rate (AWER) was representative of our current wage rates, or whether our farm could feasibly compensate H-2A workers at the new AWER rate while meeting the regulatory requirements for providing housing and food. These considerations are vital as they directly impact our ability to attract and retain skilled labor while ensuring compliance with legal obligations. Additionally, the survey missed exploring the repercussions of inflationary increases in H-2A worker wages on our farm's operations for the last few years.

The inflationary effect of the FLS on H-2A wages is noticeable in our operations, impacting both our H-2A and non-H-2A employees. For example AEWR rate on average increased 4.97% since 2019 in Kansas. Only in 2024, the AEWR rate increased by 5.71% in Kansas, unfortunately in addition to that, the rates in the housing market increased too. Especially in the last two years with the current housing market situation, it has become more challenging and expensive to provide housing to H-2A workers. Hence, the overall compensation of an H-2A worker puts pressure on our labor costs, and operational expenses increases.

Moreover, the inflationary increase in AEWR rates has cascading effects on other aspects of our operation. For instance, due to H-2A rules, interns performing tasks similar to H-2A workers receive comparable wages. This scenario creates disparities in compensation within our workforce, affecting our operational efficiency and management strategies. (It is understandable that a high school-aged worker or college intern who is learning does not provide the same

output level as an experienced H-2A worker. Hence, it is unfair to pay the same wage to both which by itself creates disparities and challenges within the operation).

Thank you for your attention and service. I welcome any engagement with the Farm Bureau moving forward as you consider these concerns.

Sincerely,

The VFF Management Team