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Agency Information Collection Activities; Proposals, Submissions, and Approvals

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Submitter Information

Email: ao eser@nyfb.org
Organization: New York Farm Bureau

General Comment

Agriculture Labor Survey

Attachments

Labor Survey 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

RE: NASS-2024-0002-0001, Agricultural Labor Survey

Dear Mr. Hopper:

New York Farm Bureau (NYFB) would like to thank you for the opportunity to provide comments on the National Agricultural Statistics Service's Agricultural Labor Survey. NYFB is New York's largest agricultural advocacy organization providing a unified voice for farmers across our state.

Our members have shared their concerns with NYFB regarding the Labor Survey on many different issues, and how the results of the Labor Survey will impact their farms. We have been made aware that labor surveys are sent to the farm owners' personal residence, rather than that of the business. Additionally, there are situations in which multiple farm owners operate a farm. There are times when it is unclear as to which owner will receive the survey. This creates confusion, and thus, the potential for a survey to not be conducted. Also, there are situations in which farmers may not receive a survey at all—whether that is due to inaccurate information in an address which the surveys are sent to, or inaccurate information regarding whether the farm qualifies to receive a survey. Another concern is the timing of the surveys. Often, these surveys are conducted during farmers' peak seasons, planting and harvest seasons, making it difficult for farmers to accomplish.

NYFB suggests that transparency and protection of farmers data be of paramount concern, while collecting the most accurate information possible. NYFB suggests the agency evaluates the farm owner's business information, address information, and then make the necessary updates. We also encourage the agency to evaluate, and engage with farmers, to determine whether different months of the year would be more beneficial for farmers to have an opportunity to fill out the surveys. Lastly, we encourage the agency to process state specific labor information when analyzing the labor surveys from farmers. Providing context of the labor landscape in New York, for example, may vary significantly from that of a different Northeast state. Having this context would provide greater insight into the economics of the labor market on farms across our state.

This survey is the basis for wages on farms across our country, including that of the Adverse Effect Wage Rate (AEWR) for H-2A employees. As such, the information and data collected through this survey must provide full context to the labor market on farms and collect the most

accurate data. The current Agricultural Labor Survey does not accurately capture market wages within agriculture. Thus, this has created a market-distorting effect on H-2A wages and the overall labor market within our industry.

Thank you for your attention and time. I would be happy to discuss any further questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Ashley L. Oeser". The signature is written in dark ink and is positioned below the word "Sincerely,".

Ashley Oeser
Associate Director of Public Policy & National Affairs Coordinator
New York Farm Bureau