

Author Full Name : clint hardy**Received Date :** 08/05/2024 03:57 PM**Comments Received :**

- I Suggest USDOL to freeze any AEWR increases until the farm labor survey and be refined to more accurately reflect US worker wages.
- USDA NASS should take steps to make sure H-2A wages are not captured in the farm labor survey. Only non-H-2A wages should be utilized to calculate the AEWR.
- I urge USDA NASS to differentiate between livestock and field wage rates. The current methodology can significantly skew the AEWR when certain livestock worker wages are included.
- I ask USDA NASS to extend the survey periods each quarter. Currently USDA NASS only collects data for only one week in a quarter. Data collection should accurately reflect the times when farmers are not heavily engaged in active crop production to allow them time to accurately respond to the survey.
- I encourage USDA NASS to develop an educational promotion to help farmers understand the importance of responding accurately to the survey, and to ensure farmers understand their responses are confidential.
- I recommend USDA NASS include a question to measure the average size of farms in the survey. Capturing and reporting labor rates based on annual farm sales would more accurately reflect domestic hired labor rates on farms.