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Critical to a farm's survival is a dependable supply of labor; however, crucial to a farm's profitability is having an economical supply of labor. Therefore, it is critical that USDA NASS updates procedures used to conduct the Farm Labor Survey that will provide consistent and reliable data that can be used in developing realistic wage rates for farm workers. The H-2A program is the primary source of labor for many farming operations ranging from fruit and vegetable production to production of field crops, and for many years the adverse effect wage rate (AEWR) that farm employers utilizing H-2A must utilize for wages has consistently failed to reflect a number of key issues that are important in developing a fair and consistent wage rate.

I feel there really is no good documentation and verification that data provided in the farm labor surveys is accurate. I once asked USDA NASS how the data is verified, and they said it was just what the respondent provides. There are ways to verify the data is correct, and I urge USDA NASS to pursue some means to verify the data is accurate because it is used in such a critical way.

First, I feel USDA NASS needs to educate farm employers about how the data they are collecting will be used in calculating various wage rates. I don't think some employers understand the extreme importance in getting the data right for both the workers and the employers. Also, I feel USDA NASS needs to do more to reassure employers that the information they are providing is given in confidence. Some employers are concerned they will be targeted for audits based on the information they provide.

Second, I feel USDA NASS conducts the quarterly surveys at some of the most busy times on a farming operation. This coupled with a relatively short survey period means many farmers rush through the survey without giving proper consideration to the questions being presented from USDA NASS. Many times I feel employers may provide answers that they feel USDA NASS expects, rather than what is real because of time constraints, or possibly because they are concerned about being targeted for future audits based on the information they provide.

Third, in the past the surveys have been conducted with no regard to farm size. Smaller operations do not have the luxury of "spreading" labor costs over a larger management plan as can large farm operations. Employing 2-6 workers is considerably different than having the acreage to employ 50-100, or more workers. I would urge USDA NASS to try and differentiate farm sizes to accurately reflect those differences.

Finally, I would urge USDA NASS, especially since US DOL Wage & Hour now has established wage rates for different job classifications to clearly differentiate, and document wages in the farm labor survey for crop, specialty crop and livestock wages, as well as various categories within those areas. This would include wages for workers employed to operate large, and technologically advanced equipment versus manual field labor, or to differentiate between general animal husbandry jobs versus specific jobs such as foaling or animal health jobs.

Again, I urge USDA NASS to consider ways to make the farm labor survey data more accurate and reliable because of the important role it plays in establishing wage rates such as the adverse effect wage rate. These wages impact the food and fiber production our nation depends upon.