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February 28, 2025

Department of Labor
Occupational Safety and Health Administration
Submitted via Regulations.gov

Re: Temporary Labor Camps; Extension of the Office of Management and Budget's (OMB) Approval of Information Collection (Paperwork) Requirements, Docket No. OSHA-2012-0012

Texas RioGrande Legal Aid, Inc. ("TRLA") is a non-profit organization which provides free legal services to migrant farmworkers. We write in response to the agency's request for comment regarding the information collection requirements in the Temporary Labor Camp Standard, 89 Fed. Reg. 107,165 (Dec. 31, 2024). Specifically, we write to address OSHA's request for comments on "[w]hether the proposed information collection requirements are necessary for the proper performance of the agency's functions to protect workers, including whether the information is useful."

The information collection requirements in the Temporary Labor Camp standards serve an important interest in protecting the health and safety of migrant farmworkers. Outbreaks of communicable diseases are not uncommon in temporary labor housing. Workers live in close quarters, often four or more to a room, and share kitchen, bathroom, shower, and laundry spaces. They work side-by-side during the day. Unscrupulous employers sometimes increase workers' risks by failing to provide hand-washing stations or by forcing workers to sleep two to a bed in temporary housing.

During the height of the COVID-19 pandemic, TRLA staff were aware of several labor camps in our service area with outbreaks. In one such case, TRLA client Marco Antonio Galvan contracted COVID-19 while employed as an H-2A worker at a large farm in Texas. Mr. Galvan was moved to a trailer with other infected workers and left to die. He never received any medical care for his condition, and ultimately died of COVID-19.¹

Mr. Galvan's case demonstrates the importance of these reporting requirements. Agricultural employers provide housing to workers because they are remote. Workers living in temporary labor camp housing are isolated, usually far from their families and support networks, and frequently without transportation of their own. This is particularly true for workers in the H-2A visa program, who are almost exclusively dependent on their employers for housing and transportation. The reporting requirements thus protect workers by

¹ See Pls.' Original Pet., *Rodriguez v. Blaine Larsen Farms, Inc.* (No. 5422H, 69th Dist. Ct. for Hartley Ct., Tex. Feb. 12, 2021) (attached).



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ensuring that local health departments are aware of outbreaks and able to work with employers to ensure that workers are provided with the medical care they need.

Sincerely,

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