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August 17, 2015

Via email and regular mail

Mr. Daniel Carroll
Office of Policy Development and Research, Room N-5641
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210
carroll.daniel.j@dol.gov

Re: *Comment Request for Information Collection for the National
Agricultural Workers Survey: Extension with Revisions (OMB 1205-0453)
FR Doc No: 2015-15730*

To Mr. Carroll:

We submit these comments on behalf of the Oregon Law Center's Farmworker Program. The Oregon Law Center (OLC) is a non-profit, legal services organization dedicated to providing high-quality legal services to low-income people in Oregon. OLC and its predecessor organization have provided legal services to Oregon's migrant and seasonal farmworkers for over thirty years, devoting a substantial portion of its resources to community education and outreach to farmworkers, particularly to indigenous farmworkers. OLC's leadership in raising awareness about the presence of indigenous farmworkers, and their acute need for improved health and safety issues is nationally recognized.

Our comments consider the practical utility of the proposed questions and revisions, and are also designed to help with clarity and consistency of the information collected. Should you have any questions on our comments, please contact Nargess Shadbeh, Director of the Oregon Law Center's Farmworker Program at nshadbeh@oregonlawcenter.org or (503) 473-8328.

Thank you,

Oregon Law Center

Julie Samples
Nargess Shadbeh

Comments as to what should be added and/or retained (currently marked for deletion on the proposed NAWS surveys)

Page	Reference	Recommendation
1	Employer	Recommend third choice: both
2-3 Also 6	A7: Country of Birth Also B2	Include whether indigenous or not Use word indigenous
2-3	HA 15+: Spouse/child use of health care services	Why only if under 22 years old? Why not 26 years old?
2-3	HA 15+Spouse/child use of health care services	Mental health counseling should be added to choices (a-c)
2-3	HA 16	Add community health worker
2-3	HA 18 Codes	Add: afraid to lose job and no paid sick leave to list of codes Consider adding question or code regarding availability of interpreters at health centers
5	A15	Do not delete A16—it would be very useful to determine if others in the household are doing agricultural work (for a variety of reasons—could contribute to overcrowding, lack of ready access to showers to remove pesticide residue, etc.)
6	B3	Keep—if the Department is interested in learning about education, training and digital literacy, the responses to this question could be very informative
6	G4	Keep Legal Services choice
7	B7 and B8 and B 20-24: Language fluency	Move to beginning of survey to make sure surveying in correct language
8	B10	Provide definition of farm work
9	D65	What is a migrant center? Is that housing made possible through RD funds or similar affordable housing funding? It would be useful to know if the individual lives in a “labor camp” or a migrant center and the options should not be lumped together as the ability to access services

		might be quite different.
9	D34a	Also a significant number of workers live in motels/hotels without access to kitchens and proper individual beds. Capturing that information would be very useful. Recommend not deleting options under D34a.
15	D7	Add every 15 days as an option
15	D20-21	The responses regarding a bonus could be interested in terms of determining common practices. Recommend not deleting.
16	D28-29	Both questions are useful in getting a realistic picture of job stability for workers. Recommend not deleting.
16	D39a	This question should be retained as these kinds of costs can be the difference between the ability to feed one's family or not, and when workers are asked to pay for equipment, it is very stressful and could lead to worse health outcomes.
17	E1	Unclear on the reason for deletion. Recommend keeping.
19	EP5 –EP7	Recommend keeping as these responses are important for worker health and rule-making. Workers don't always have the ability to use health centers to address pesticide exposure and any resulting injury or illness because health centers have prioritized other health issues like diabetes, and many don't want to be involved in the workers compensation system. Workers are often reluctant to seek treatment for fear of losing job, and due to the assumed cost. This information could be critical to health centers considering treating workplace injuries and illnesses.

21	NT2a	Add follow-up questions regarding the usefulness of the training and if individual was able to ask questions during the training.
21		Add question re availability of towels (if workers dry hands on pants, defeats purpose of washing hands)
24	NH6	Add follow-up question—if pap smear was abnormal, was there any place she could go for follow-up and treatment?
26		Add if sought health care services for pesticide exposure and workplace assault (in addition to general question re illness or injury)
27	DI1	Add where—home, school, library, others
28	4	Add could not speak my language to codes for “4”
29	8, 11, 12	Add concerned about legal status to list of options