

National Agricultural Workers Survey Summary of Stakeholder Feedback on the Survey

Supplementary Documentation for Part A of the Information Collection Request Office of Management and Budget Control No. 1205-0453

Introduction

In its August 2017 clearance terms for the National Agricultural Workers Survey (NAWS), the Office of Management and Budget (OMB) required the Employment and Training Administration (ETA) to convene one or more meetings with stakeholders, including OMB, to understand current and future information needs of Federal users and sponsors of NAWS data.¹ This document: 1) summarizes feedback that ETA received from stakeholders between November 2017 and September 2019 concerning their information needs and the suitability of the NAWS questionnaire and design for meeting those needs; and 2) outlines ETA's proposed plans to address new information needs.

Feedback Activities

ETA learned about the information needs of Federal users and sponsors of NAWS data and obtained feedback on the NAWS questionnaire and survey design from a diverse group of stakeholders² through interagency meetings, agricultural worker health and education conferences, agricultural data workshops that focused on the NAWS, and an online survey.³ The feedback is summarized below, by stakeholder group.

Federal Agencies⁴

¹ OMB's 2017 clearance terms for the NAWS also required ETA to identify methodological issues in the survey's current design and propose a process to prioritize and address them. ETA discusses its efforts to identify and address methodological issues in Part B of the Information Collection Request Supporting Statement and associated supplemental documents.

² The following stakeholder groups shared their information needs and provided feedback on the survey: 1) Federal agencies; 2) Federal agency grantees; 3) agricultural industry representatives; and 4) farm labor researchers.

³ ETA staff hosted three interagency meetings and attended two agricultural data workshops that focused on the NAWS. OMB staff attended one of the interagency meetings. ETA's NAWS contractor solicited feedback on information needs and the survey from Federal agency grantees at two agricultural worker conferences. ETA also received comments on the survey through the Paperwork Reduction Act 60-day public comment period. ETA summarized the '60-day comments' in Part A of the Information Collection Request Supporting Statement.

⁴ Appendix A lists the Federal agencies that were represented at one or more meetings and NAWS workshops and/or responded to an online survey about farm labor information needs.

Federal agency staff discussed their information needs at ETA-hosted interagency meetings in November 2017, May 2019, and July 2019. Additionally, in April 2018 and April 2019, a small number of Federal staff participated in two agricultural data workshops that focused on the NAWS.⁵ Lastly, in June 2019 staff from nine Federal agencies responded to an online survey about their agency's information needs and the suitability of the NAWS for meeting them.⁶

Through the above activities, Federal staff informed ETA that their programmatic responsibilities determine their agricultural labor information needs. For example, Health and Human Services, Education, Labor, and Legal Services Corporation staff who manage programs that provide services to migrant and seasonal farm workers (MSFW) reported that they continue to need NAWS data that informs about the number, distribution, and social services needs of program-eligible MSFWs and their dependents. Within this context, several staff commented on the increasing difficulty identifying MSFWs who are eligible for Federal programs and the need to closely align NAWS questions with program eligibility criteria.

United States Department of Agriculture (USDA) and Environmental Protection Agency (EPA) staff also discussed their information needs in the context of programmatic functions. USDA Economic Research Service (ERS) staff informed that ERS needs NAWS demographic and employment (wages and hours of work) information, particularly on labor-contracted workers, to measure changes in agricultural productivity.⁷ Additionally, ERS commented on its use of NAWS data to analyze a broad range of policy issues, from wage trends, social service use, health matters, and migration and legal status topics.⁸ EPA staff, meanwhile, informed that

⁵ The NAWS Workshops were held at the University of California (UC) at Davis, in conjunction with annual UC Davis-hosted farm labor seminars.

⁶ See Appendix C for the "Feedback Form". Ten staff from the following nine agencies responded to the survey: 1) Department of Health and Human Services (HHS), Administration for Children and Families; 2) HHS, Health Resources and Services Administration; 3) Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health (NIOSH), Division of Safety Research; 4) NIOSH, Division of Surveillance, Hazard Evaluations, and Field Studies; 5) Department of Education, Office of Migrant Education; 6) Department of Homeland Security, Office of Immigration Statistics; 7) Department of Labor (DOL), Occupational Safety and Health Administration; 8) DOL, Office of the Assistant Secretary for Policy; and 9) Environmental Protection Agency.

⁷ ERS draws on NAWS data to construct, every two years, a quality-adjusted price index for purchased contract labor services in crop agriculture.

⁸ Related to its uses of NAWS data, ERS informed that it would be helpful to know precisely how NAWS wage and legal status variables are constructed. Additionally, ERS asked whether the survey's random sampling of agricultural employers results in a disproportionate share of small employers in the sample, and if the sampling methodology accounts for some of the differences ERS has found in some demographic characteristics of crop workers when comparing NAWS findings with those from the Current Population Survey (CPS) and the American Community Survey. ETA staff provided ERS the detailed coding underlying NAWS wage and legal status variables

EPA needs agricultural worker demographic, employment, and health information to conduct health assessments and develop appropriate training standards to protect farm workers.

The feedback that ETA received from Federal agency staff informs that the current NAWS questionnaire and design are sufficient for meeting many, but not all, Federal agency information needs concerning agricultural workers. Among the ten Federal staff who responded to the online survey, six reported that the current questionnaire was not sufficient for meeting information needs. Nearly all of the suggested questionnaire changes concerned farm worker health.⁹

Several Federal agency staff also recommended that ETA change the NAWS design. The design recommendations concerned increasing the survey's sample size so that data may be reported for more states, interviewing some of the same workers over time for longitudinal assessments of health and employment characteristics, interviewing agricultural workers in Hawaii, and expanding the survey to include additional agricultural worker populations, such as livestock, forestry, agricultural processing, and especially H-2A workers. Federal staff explained that it is important to include H-2A workers in the NAWS because:

- They have become too numerous to ignore;
- They need to be interviewed to have a clearer picture of industry trends;
- Survey data on H-2A workers will facilitate policy analysis relating to H-2A programs; and,
- As H-2A workers are eligible for some of the services that Federal MSFW programs provide to domestic agricultural workers, it is important to collect demographic, employment, and health data on this subpopulation of agricultural workers.

When soliciting feedback from stakeholders, ETA also inquired about information needs in the context of emerging program and policy issues. Within this framework, Federal staff commented that it would be helpful if the NAWS could collect, or report where already collected, information to address the following issues:

- Substance abuse (use of opioids and marijuana were identified separately)
- Mental health of farm workers' children

and a dated report that explains why the NAWS and CPS differ in some key demographic findings.

⁹ See Appendix C for the feedback form and suggested questionnaire changes.

- Dental health
- Use of telehealth
- Climate change, e.g. how do extreme weather events affect farm worker employment, health, and access to health care?
- Health and injury risks associated with night-time employment
- Heat-related illness and injury
- Increasing use of the H-2A program
- Increasing use of labor intermediaries in agriculture, i.e., labor contractors
- Sexual assault
- Human trafficking
- Indigenous populations
- Use of technology in farm jobs to inform employment training programs
- Contextual information on farm workers' goals and aspirations to inform employment training programs

Federal Agency Grantees

ETA's NAWS contractor presented survey findings in February and March 2018 at the Health Resources and Services Administration (HRSA)-sponsored Western Forum on Migrant and Community Health and the Administration for Children and Families (ACF)-sponsored National Migrant and Seasonal Head Start Association Conference, respectively. At these events, and on behalf of ETA, the contractor solicited and obtained feedback from HRSA and ACF grantees on their information needs and the NAWS questionnaire and design.

Grantees suggested a large number of new question domains and a small number of survey design changes. In line with their missions, the grantees' requests for NAWS questionnaire changes largely concerned the health, housing, and migration of farm workers. To align the survey with the agricultural worker populations the grantees serve, the grantees recommended that ETA expand the NAWS to include H-2A and dairy workers. Grantees also recommended that the NAWS follow the same workers over time to see how demographic, employment, and health conditions change. The grantees' recommendations for questionnaire and design changes are in Appendix B, *Grantee Feedback on the NAWS*.

Agricultural Industry Representatives¹⁰

Agricultural industry representatives participated in the April 2018 and April 2019 agricultural data workshops that focused on the NAWS and provided feedback to ETA staff on the strengths and weaknesses of the survey. They informed that the NAWS provides valuable information that helps the industry understand key trends in the crop labor force for policy purposes. However, they also identified the need for additional information related to farm labor supply and farm worker training, and suggested ways that ETA could strengthen the utility of the NAWS to inform programs and policies.

Agricultural industry representatives commented on the shrinking supply of labor for agriculture and the need to improve data related to supply issues. They noted that NAWS findings on the inelasticity of supply to increases in wages, place of birth, average age and migration patterns helped them understand the policy landscape, but that they need additional information on farm worker housing and retention. Referring to the uncertainty of farm labor supply, one representative noted that California's \$40 billion agricultural industry was "built on sand". Looking to the future of perishable crop agriculture, agricultural industry representatives noted that it will become much more capital intensive, e.g. more mechanized, but that there will continue to be a need for labor. If the supply of farm labor continues to shrink, agricultural industry representatives noted that the NAWS could play an important role identifying workforce skills development gaps as the industry adopts more labor-saving technologies.

One representative informed that some California agricultural employers were separating workers into crews based on gender for sexual harassment reasons, asked if the NAWS picks up crew differences, and opined that it would be helpful to include questions in the NAWS on sexual harassment training.¹¹ Agricultural employers need this information, according to the representative, to: 1) determine if employers and labor contractors are providing required training on sexual harassment; 2) ascertain if the provision of sexual harassment training differs between direct-hire employers and labor contractors; and 3) identify strategies employers are implementing to prevent sexual harassment.

¹⁰ Representatives from the National Council of Agricultural Employers, the California Farm Bureau Federation, and the California Farm Labor Contractors' Association participated in the workshops.

¹¹ As discussed on page 16 of Part B of the Supporting Statement, NAWS interviewers do not attempt to sample workers from different crews when there is more than one crew at an establishment. Given the possibility that employers and supervisors create crews based on distinct demographic and employment characteristics, e.g., gender, H-2A versus non-H-2A, ETA will reassess crew selection in the survey.

There was consensus among agricultural industry representatives that ETA could strengthen the utility of the NAWS for program and policy purposes by:

- Releasing findings (reports, etc.) and data files sooner after data collection, e.g., within a year;
- Providing findings in a more “digestible” format;
- Providing more findings on the NAWS Web page;
- Integrating NAWS data with other agricultural data when reporting findings to provide a wider picture of agricultural trends;
- Increasing sample sizes to report findings at smaller geographic breakouts;
- Publishing a national-level estimate of the number of agricultural workers; and
- Expanding the survey to include H-2A, livestock (dairy), and cannabis workers.

Farm Labor Researchers

Farm labor researchers from four land grant universities prepared NAWS-based papers and discussed the strengths and limitations of the NAWS for meeting current and future information needs at the aforementioned agricultural data workshops. In addition, two non-academic farm labor researchers with extensive experience working with NAWS data on a variety of farm labor issues participated in the workshops and provided feedback on the survey.

Farm labor researchers agree that NAWS data are an important source of information on farm workers not available from any other source.¹² Their major suggestions to improve the NAWS include¹³:

1. Publish NAWS data regularly. The Bureau of Labor Statistics, Census Bureau, and USDA’s National Agricultural Statistics Service collect and publish most data on U.S. households, workers, and farms on a regular schedule, while ETA publishes NAWS data on an irregular schedule. A universal wish is for timely publication of NAWS data on a regular schedule.

¹² One researcher stressed that the NAWS should not be the lone information source on crop workers and emphasized that policy makers need a broader research strategy to inform programs and policies that affect agricultural workers and employers.

¹³ These suggestions are in the report that the contractor prepared for this feedback activity: *NAWS at 30: Methodology, Research, and Future*.

2. Include H-2A and livestock workers. The number of jobs the Department certified to be filled with H-2A workers tripled between 2008 and 2018, making H-2A workers a major factor in many farm labor markets. Interviewing H-2A workers alongside other crop workers would allow comparisons between H-2A and non-H-2A workers, including experience doing farm work, productivity, and plans to continue to do farm work. Livestock accounts for almost half of the \$375 billion value of farm output and a quarter of average farm employment. Livestock employers, especially dairies, have been complaining of labor shortages, making it important to understand who works on livestock farms, their employment and earnings, and plans to continue to do farm work.
3. Collect more data on employers. The NAWS collects data from employed workers on their demographics, employment and earnings, and health and social services used, but collects data from employers only on: 1) the number of workers employed the day workers are interviewed; and 2) the employer's primary commodity. Most information collections obtain employment and earnings data from employers. If the NAWS obtained from employers total wages paid and hours worked for the previous pay period, researchers and policy makers could more easily compare farms on which the NAWS interviews workers with those in the Quarterly Census of Employment and Wages and the Farm Labor Survey.
4. Revise the questionnaire. When adding and revising NAWS questions, ETA should aim to use the same questions that are in the American Community Survey and Current Population Survey to facilitate comparisons across these surveys, including questions that allow respondents to self-report their health status. With production practices changing rapidly in some commodities, ETA should consider adding questions to the NAWS that ask workers more details about the jobs they are doing and how their jobs are being affected by labor-stretching changes, some of which make farm work easier, and labor-saving changes that eliminate farm jobs.
5. Expand the sample and embed a panel. The NAWS reports data for multi-state regions and two states, California and Florida. Many important farm labor questions and policy responses are state-specific, including farm worker housing and health and social service issues. A larger sample could provide the data for evidence-based policy making at the state

level on issues important to farm employers, workers, and communities. Some researchers want reliable county-level data, which would require a very large survey, and some want ETA to publish NAWS sample weights in order to expand workers interviewed to estimate the number of crop workers by region, state, and/or county. Several researchers emphasized that longitudinal data are needed to examine changes over time in health status and the effects of education and training.

6. Monitor agricultural changes. Agriculture is changing rapidly as sensors spread and employers use artificial intelligence to analyze data and deal with particular plants and animals. Who will fill new jobs that require analysis of data and responses to problems that technology detects? In many cases, experienced workers with little education operate expensive farm equipment. Will the same up-the-ladder mobility be possible with new and emerging technologies, or will nonfarm firms with college-educated staff provide monitoring and response as a service to farmers, displacing less-educated workers? ETA could use the NAWS to monitor these agricultural changes and inform appropriate employment training responses.

ETA's Proposed Plans to Address New Information Needs

Assessing suggestions for NAWS questionnaire and design changes requires the sustained input of subject matter experts in many disciplines, and needs to consider data quality, competing priorities, impacts on employer and respondent burden, survey costs, and the availability of resources. As such, and as part of the survey change process, ETA appreciates very much the thoughtful feedback that it received from NAWS stakeholders over the last two years.

Over the next year, and in response to the feedback, ETA will continue engaging with NAWS stakeholders to identify and prioritize potential changes to the NAWS questionnaire and design to address Federal agency information needs concerning agricultural workers and the farm labor market. In addition, and as discussed in Part A of the supporting statement for this information collection request, ETA will:

1. Continue to administer the supplemental questions on preventive health, mental health, use of digital information devices, and education and training that ETA added to the survey in fiscal year (FY) 2018, in support of ETA and Federal partner information needs;
2. In concert with NAWS Federal partners and other survey stakeholders, develop and test new questions on job satisfaction, attachment to the farm labor market, and exposure to labor-saving technology for potential inclusion in the survey in FY 2021 (the data derived from these questions will help to identify training and personnel management practices to attract and retain a reliable labor force);
3. Explore with NAWS Federal partners and other survey stakeholders the feasibility of expanding the NAWS to include additional agricultural worker populations;
4. Develop new methods and practices for disseminating the survey's findings, such as creating data tables online, and providing webinars on how to access and use the public data files;
5. Continue assessing and improving the survey's methodology to decrease costs, identify and reduce sources of survey design effects, and determine whether employer non-response warrants additional methodological changes; and
6. Establish a regular release schedule for public access data and other dissemination products.

Appendix A
Federal Agencies that Participated in Feedback Activities Concerning Information Needs
and the
Suitability of the National Agricultural Workers Survey for Meeting Them

Staff from the following agencies participated in one or more feedback activities concerning their agency's information needs and the suitability of the National Agricultural Workers Survey (NAWS) questionnaire and design for meeting them:

- Department of Health and Human Services
 - Administration for Children and Families
 - Health Resources and Services Administration
 - Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health
 - Division of Safety Research
 - Division of Surveillance, Hazard Evaluations, and Field Studies
- Environmental Protection Agency, Office of Pesticide Programs
- Executive Office of the President, Office of Management and Budget
- United States Department of Agriculture
 - Economic Research Service
 - National Agricultural Statistics Service
- Department of Homeland Security, Office of Immigration Statistics
- Department of Commerce, Bureau of Economic Analysis
- Department of Education, Office of Migrant Education
- Legal Services Corporation
- Department of Labor
 - Employment and Training Administration
 - Office of Policy Development and Research
 - Office of Foreign Labor Certification
 - Office of Workforce Investment
 - Occupational Safety and Health Administration
 - Office of the Assistant Secretary for Policy
 - Wage and Hour Division

Appendix B
Grantee Feedback on the National Agricultural Workers Survey

Question posed to grantees:

What changes to the National Agricultural Workers Survey design and/or questionnaire are needed to better meet information needs?

I. Feedback from the Western Forum on Migrant and Community Health, Seattle WA, February 22, 2018

Change survey procedures:

- Include H-2a workers

Include on the questionnaire:

- Access to contraceptives
- Language barriers and issues
- Housing conditions
- Is housing affordable?
- Are workers victims of bullying, abuse, harassment?
- Are workers labor trafficked?
- Use of sex workers
- Heat related illness
- Sexual orientation/ Gender identity (SOGI)
- Social Determinants of Health questions developed by the National Association of Community Health Centers
- What are workers immediate needs?
- What apps are they using?
- Access to health information via technology
- Social support
- Laundry and bathing facilities
- Mental health

II. Feedback from the National Migrant and Seasonal Head Start Association Conference, Costa Mesa CA, March 5, 2018

Change survey procedures:

- Include dairy, livestock, forestry and fisheries workers
- Follow up with people to see how things change

Include on the questionnaire:

- Questions that better align with migrant program eligibility definitions
- Has worker lost work due to H-2a workers?

- Why did former migrants settle out (include when they settled out to determine if recent or a while ago)?
- Ask more questions about child care for children under the age of 6
- Ask about knowledge of and awareness of Migrant and Seasonal Head Start
- Labor trafficking
- Breastfeeding
- Housing
- Homelessness – ask questions that allow identifying McKinney Vento eligible migrants
- Does housing affect if and where families travel?
- Ask about new migrants from Puerto Rico
- Children’s medical conditions, specifically, obesity, diabetes, anemia and asthma
- Ask about children with special needs
- Prenatal care
- Substance abuse/Opioids
- Ask if they have applied for a visa and are waiting for legal status (in the queue)
- Protective factors for trauma informed care
- Are there more teen mothers? [It was not clear if this recommendation concerned looking for teens with children or asking age at birth of first child.]

Appendix C: Feedback Form

HELPING ADDRESS FEDERAL AGENCY INFORMATION NEEDS VIA THE NATIONAL AGRICULTURAL WORKERS SURVEY

Thank you for attending the May 22, 2019 webinar on the National Agricultural Workers Survey (NAWS). As discussed during the webinar, we are providing you this form to help you prepare for a meeting this summer at which the Employment and Training Administration (ETA) hopes to learn about your agency's farm labor information needs in the context of statutory requirements, and current and emerging program and policy issues.

Learning about your agency's information needs, and determining whether ETA should modify the NAWS to help address them, will help ETA comply with Office of Management and Budget clearance terms for the survey and support your agency's work.

You are receiving this form because the DOL NAWS Program Manager has identified you as the primary point of contact for your agency. As there may be others in your agency who also use farm labor information, please consult with them when completing this form, as appropriate.

Please submit your comments by June 17, 2019. Thank you!

1. Your Name

2. Your Organization

3. Please describe your agency's current and future farm labor information needs, if any.

4. Does your agency or its affiliates, e.g., grantees, use NAWS data or findings for programmatic or policy purposes?

5. If you answered yes to question 4, please describe the NAWS data/information you are using, the purpose, frequency, and any shortcomings.

6. In its current form, is the NAWS questionnaire (attached) suitable for meeting your agency's information needs?

7. If you answered no to question 6, what changes to the questionnaire would help your agency meet its needs?

8. Thinking about the NAWS survey design <https://www.doleta.gov/naws/methodology/> , e.g., the sampling methodology, population sampled, the frequency of data collection, geographic coverage, etc., does your agency have any recommendations concerning the design that would help your agency address its information needs?

9. Do you have any other suggestions concerning the NAWS questionnaire or design?

10. Do you have any suggestions concerning the dissemination of NAWS data and findings?

11. If you are aware of research products, such as reports, briefs, or PowerPoint presentations that are based on or use NAWS data or findings, please provide links to those products:

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Thank you for sharing your agency's information needs!

Question 6. *In its current form, is the NAWS questionnaire (attached) suitable for meeting your agency's information needs?*

“No” responses:

#	Response
1.	Detailed information related to work-related injury, pesticide exposure, respiratory issues, and mental health items are not routinely collected in NAWS and require external funding.
2.	Need more information on physical and mental health of farm laborers and their families.
3.	For D37a, answer 1 “I’m located at the job”: It would be helpful to have follow up questions asking how far the field is from their residence/worker housing, how this affects them, and if they use any precautions, i.e., closing windows, bringing anything inside, etc.
4.	NP1f asks about loading, mixing, or applying pesticides in the last 12 months. It would be helpful to have questions that ask if they received additional training from what the workers receive to become a pesticide handler, receive necessary PPE, and if they have to use a respirator (if yes, whether they have received fit testing, medical evaluation, and respirator training).
5.	NT2a currently says “In the last 12 months, with your current employer, has anyone given you training or instructions in the safe use of pesticides (through video, audio, cassette, classroom lectures, written material, informal talks or by any other means?). This question, as is, asks about the safe use of pesticides, which under the Worker Protection Standard (WPS) would be interpreted as a question for pesticide handlers since they are the ones who use pesticides. In order for this to be about annual WPS training (for workers and handlers), consider the following amendment: “...has anyone given you training or instructions on pesticide safety...” There could also be a follow up question asking if the training has helped them better understand pesticide safety.
6.	HA1 covers if the study participant has received health services for illness and injury in a broad sense and is not specific enough. A more specific question would be if the participant has ever experienced symptoms of pesticide illness or injury while working on an agricultural establishment. And if yes, if the participant was ever taken to a medical facility to receive treatment.
7.	I would like to be able to track incidence of “Valley Fever” (Coccidioidomycosis).
8.	It would be helpful to have a question focused on the dependents of farmworkers, similar

	to question ET12. For example, “If there were education programs, of any kind, for the children (dependents) of farm workers, and there were no obstacles to attend, would you have your children (dependents) attend a program?” And, add a follow up question asking what barriers exist for involving their children in such programs.
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