



United States Department of Agriculture  
National Agricultural Statistics Service



June 10, 2024

VFF Management Team  
Vulgamore Family Farms  
Western Kansas

Dear VFF Management Team:

Thank you for your letter pertaining to the National Agricultural Statistics Service' (NASS) intention to renew the surveys in the Agricultural Labor Information Collection Request (ICR). Your support of the Agricultural Labor Survey is appreciated. Your submitted letter included some recommendations for the upcoming Agricultural Labor Surveys and use of the summarized data from the survey, which will be addressed here.

At the conclusion of each survey, NASS evaluates its performance to identify potential improvements. The evaluation includes agency experts on agricultural labor and survey methodology with cognitive testing of potential significant changes. The current instruction to report wages on the questionnaire "*Gross wages are the total amount paid to workers before taxes and other deductions. INCLUDE the worker's share of social security and unemployment insurance, but EXCLUDE the employer's share. INCLUDE in-kind payments (e.g., agricultural product like a side of beef, bushels of grain, etc.) provided in lieu of wages for work done. In-kind payments do NOT INCLUDE benefits such as housing, meals or insurance.*" was the result of the evaluation. NASS offers assistance for respondents on completing the survey by calling 1-888-424-7828 between the hours of 7 A.M. to 4 P.M. ET.

NASS is transparent in our methodologies for data collection and estimation of the farm labor data. The *Farm Labor Methodology and Quality Measures* documents response rates along with information how the surveys are conducted. The *Farm Labor Methodology and Quality Measures* documents and questionnaires used can be found at this link on NASS' public website: [https://www.nass.usda.gov/Publications/Methodology\\_and\\_Data\\_Quality/Farm\\_Labor/index.php](https://www.nass.usda.gov/Publications/Methodology_and_Data_Quality/Farm_Labor/index.php)

One goal of any change to the Agricultural Labor Survey is to minimize respondent burden while keeping to the purpose of the survey as mentioned in the "*Farm Labor Methodology and Quality Measures*".

The Agricultural Labor Survey is conducted at a level consistent with appropriated funds from the US Congress. DOL partially funded the NASS farm labor program until FY2021. Additional funding would be required for the collection and summarization of additional information.

Hopefully, this answers your questions about how data are collected and summarized for the Agricultural Labor Survey.

The *Farm Labor Methodology and Quality Measures* and other documents pertaining to the Agricultural Labor Survey along with a proposed questionnaire and other comments NASS received will be made available later this summer for a 30-day public comment period. A Federal Register Notice (FRN) for OMB Control Number 0535-0109 will be published when that happens; the FRN will include instructions on how to review and comment further on the survey before official action is taken by the Office of Management and Budget (OMB).

As a reminder, the U.S. Department of Labor is responsible for all policy and implementation of the Adverse Effect Wage Rate (AEWR). Federal Register Notices on AEWR provide a Department of Labor contact for more information about AEWR. Federal Register Notices may provide the public an opportunity to comment on proposed methodology changes for setting the AEWR.

We will keep you informed of any other modifications through Federal Register Notices.

Sincerely,

Lance Honig  
Chair, Agricultural Statistics Board  
U.S. Department of Agriculture  
National Agricultural Statistics Service