



United States Department of Agriculture  
National Agricultural Statistics Service



June 10, 2024

Jamie Clover Adams  
Executive Director  
Michigan Asparagus  
12800 Escanaba Drive, Suite A  
DeWitt, Michigan 48820

Dear Mr. Adams:

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.

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 Quality Measures document 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)

At the conclusion of each survey cycle, 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. This testing includes estimating the *average* length of time respondents require to complete the survey. The current average length of time needed to complete the survey (i.e., 30 minutes) is a result of this times. However, we will inform the Agricultural Labor Survey team that this amount of time may need to be revisited.

Hopefully, this will answer your questions about how data are collected for the Agricultural Labor Survey.

The *Farm Labor Methodology and Quality Measures* document mentions that "The NASS Agricultural (Farm) Labor Survey provides the basis for employment and wage estimates for all workers directly hired by United States farms and ranches (excluding Alaska), for each of four quarterly reference weeks. Selected annual average estimates are summarized from the associated quarterly estimates." If the H2A workers are directly hired by the operation, data for those workers would be included in the survey. To keep survey results comparable with previous Farm Labor bulletins, the definition should be the same.

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).

We will keep you informed of the progression of the Agricultural Labor Survey through Federal Register Notices.

Sincerely,

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