



United States Department of Agriculture
National Agricultural Statistics Service



June 10, 2024

Mily Trevino Saucedo
Executive Director
Alianza Nacional de Campesinas, Inc.
P.O. Box 20033
Oxnard, CA 93034

Dear Ms. Trevino Saucedo:

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.

The *Farm Labor Methodology and Quality Measures* (QM) reports that accompany each Farm Labor report address the topics of many of your recommendations. NASS is transparent in our methodologies for data collection and estimation of the farm labor data. The *Farm Labor Methodology and Quality Measures* documents can be found at this link on NASS' public website:

https://www.nass.usda.gov/Publications/Methodology_and_Data_Quality/Farm_Labor/index.php

The following address your specific suggestions:

Suggestion: "...we would like to see more information gathered on the migratory nature of workers, where they work and change location over the course of the year." This would be outside the scope of the current Agricultural Labor Survey, as defined in QM document. Testing would be required to determine if the Agricultural Labor Survey would be an appropriate mechanism to obtain the desired statistics without affecting the data necessary to publish the Farm Labor report. This recommendation can be considered if additional budgetary resources are available for testing and expanding the scope of the current Agricultural Labor Survey.

Suggestion: "NASS should also include data on contracted labor, workers hired and paid by third party contractors . . . We're aware the NASS has considered the collection of this data in the past, and we recommend further testing survey questions that are simple and ask respondents to report on the entire number of workers regardless of who hired or paid them". This would be outside the scope of the current Agricultural Labor Survey, as defined in QM document. Testing would be required to determine if the Agricultural Labor Survey would be an appropriate mechanism to obtain the desired statistics without affecting the data necessary to publish the

Farm Labor report. This recommendation can be considered if additional budgetary resources are available for testing and expanding the scope of the current Agricultural Labor Survey.

Suggestion: “. . . we would like to see that [dairy worker] representation is accounted for as they also are an emerging group of workers in comparison to farmworkers working on produce operations.” Dairy operations are included in the Agricultural Labor Survey population and sampling as with all other types of farming operations. Reference the QM document mentioned above.

Suggestion: “We would also like to see other attributes included, for instance, gender, race, language/s spoken, and age.” This would be outside the scope of the current Agricultural Labor Survey, as defined in QM document. Testing would be required to determine if the Agricultural Labor Survey would be an appropriate mechanism to obtain the desired statistics without affecting the data necessary to publish the Farm Labor report. This recommendation can be considered if additional budgetary resources are available for testing and expanding the scope of the current Agricultural Labor Survey.

Number of Mailings Discussion: Please see the QM document mentioned above for a detailed discussion of the population definition, sampling, and how nonresponse is accounted for. Prior to each sampling cycle, survey performance is analyzed to determine if additional sample is needed to meet the publication goals identified in the QM document.

If the Alianza Nacional de Campesinas, Inc. would like to assist with outreach to US farmers, feel free to contact NASS’ Public Affairs Office at SM.NASS.OA.PAO@usda.gov.

Survey Length/Content: Agricultural Labor data reported by respondents are protected by Federal Law from disclosure as described at this link on NASS’ public-facing webpage: https://www.nass.usda.gov/About_NASS/Keeping_Data_Safe/index.php. Language citing the Federal Law protecting respondent data also appears on the first page of the questionnaire.

Testing would be required to determine if the Agricultural Labor Survey would be an appropriate mechanism to obtain information on hours worked without affecting the data necessary to publish the Farm Labor report. This recommendation can be considered if additional budgetary resources are available for testing and expanding the scope of the current 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).

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