

SAMPLE COMMENT LETTER:

Proposed Rule- Temporary Agricultural Employment of H-2A Nonimmigrants in the United States

Ms. Adele Gagliardi
Administrator
Office of Policy Development and Research
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW, Room N-5641
Washington, DC 20210

September XX, 2019

RE: RIN 1205-AB89

I write in support of the Department's proposed changes to the H-2A program and ask that you consider additional reforms to make the program more user-friendly.

As a farmer, it is critical that I have access to a reliable labor source. Some proposed changes in this rule that will make the H-2A program more user friendly and should be finalized to include allowing for staggered entry, shifting from the 50% rule to 30 days, revising the transportation reimbursement provision, and streamlining the application process.

I do have concerns with the proposed creation of separate adverse effect wage rates (AEWR). A farmworker often performs numerous tasks in a day that fall into different wage classifications and pay rates. I'm concerned that additional recordkeeping burdens may result if this proposed change is made. Additionally, I must stress how important that improvements to the procedure used to set the AEWR reflect economic conditions and benefits already provided to H-2A workers.

Finally, I urge the Department to include a provision in the final rule to allow year-round farming operations to access the program.

[Insert Personal Story- provide insight into your experiences with the H-2A program. Express your support for other reforms you would like to see made to the H-2A program to make it more effective and efficient for farmers to use.]

I thank the Department for recognizing the need for agricultural labor reform and urge that the final rule include these changes that will ensure American farmers have access to a reliable labor source.

Sincerely,

[Insert Name]

[Insert City, State]