

Employer Sanctions Citations in California Agriculture

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Employer Sanctions

The Immigration Reform and Control Act of 1986 (IRCA) imposed, for the first time in U.S. history, a universal requirement that every employer verify the employment eligibility of all existing employees and new hires. The full requirement provides detailed instructions to employers regarding how this employment verification process is to be conducted (CFR, 2001). Briefly, each employee and newly hired worker is to complete the newly created Form I-9, and present for inspection by the employer suitable documents to demonstrate compliance with the requirements of immigration law. Failure by the employer to properly carry out this requirement can result in the imposition of sanctions by the Immigration and Naturalization Service (INS), up to and including fines and imprisonment.

The intention of this new requirement was to delegate to employers the responsibility for excluding from the work force all persons who are not eligible for employment under U.S. immigration law. Presumably, the hiring decision is the key point at which to apply this requirement, causing the least disruptive imposition on productive activities. Once hired and on the job, the weeding out of non-compliant employees could be quite disruptive, and might trigger costly delays and litigation. Thus, giving major responsibility for enforcement to employers would, it was postulated, eventually close the employment door to ineligible persons.

Inspections by INS include review of Form I-9 records for each employee, examination of documents presented by the employee in support of claims of eligibility for employment, and a determination of whether or not the employer has met the obligations of the law. Citations can be issued in a number of circumstances: failure to require the employee to complete Form I-9; finding that inadequate documentation was submitted by the employee; intentional circumvention of the requirement on the part of the employer; and so on.

Over 125 million persons are employed in the U.S. (U. S. Bureau of Labor Statistics, 2002 a). There are more than seven million employers. So the task of inspections for proper compliance with the employer sanctions provisions of IRCA is monumental for a relatively small agency, such as the INS. Even if as many as 100 persons were assigned to this verification task on a full-time basis, and even if each was able to completely inspect the records of a single employer in just one day, an impossible task if the employer has thousands of employees, fewer than 25,000 employer inspections could be completed in a year's time. As against the millions of employers, it is clear that less than 0.3% of all U.S. employers could be reviewed in a given year.

The depth of the problem of enforcement is best understood by realizing that while foreign-born workers comprise 12% of the labor force, during the past few years more than 40% of new hires have been foreign-born persons (U.S. Bureau of Labor Statistics, 2002 b). Clearly, the recovery from the early 1990s recession has disproportionately relied on foreign-born workers. This remarkable fact reflects the

nature of many new jobs added in the years subsequent to the recession: janitors, health care aides, food service and farm labor, to identify just a few of the more numerous.

Employer Sanctions Citations: United States

The Employer Sanctions Data Base (more precisely termed Case Closed File by the INS) of the Center for Immigration Studies (CIS) serves as the data source for the analysis that follows. A full description of the database has been provided elsewhere as well as the procedures followed in cleaning the file.

Altogether, there are 57,845 citations in the database, commencing with the first in 1988 and the most recent in 2000. Only partial records are in the data file for FY2000 and, possibly, FY1999.

This implies that about 4,820 employers per year were cited over the 12-year period. The average number of U.S. employers in each year during the period is not accurately known, but it is fair to say that citations were issued to fewer than 0.1% of all employers in a typical year.

However, comparison is possible with all covered employees (U.S. Bureau of Labor Statistics, 2002 c). In 1997, for example, the BLS reports that there were 7,369,473 firms which had employees covered under the unemployment insurance program. Thus, the 5,886 citations for that year amounted to just 0.08% of all covered employers. Clearly, the fraction of all employers represented in citations must be smaller.

Figure 1 shows the record of all citations, by Federal fiscal year. After start-up in FY1988 and FY1989, the number of citations peaked in FY1990, at 9,560, then fell off substantially in subsequent years until FY1997 and FY1998, when they rose again to nearly 6,000 citations per year.

Most citations were concentrated in a few industries: 55% of all citations were in just two industries, Retail Trade and Services. Figure 2 shows the distribution of citations by Industry Group. The prominence of the high proportion of citations issued to employers in Retail Trade and Services is striking.

Only 7% of all citations were issued to employers in the Agriculture, Fishing and Forestry industry group. Manufacturing accounted for 14% and Construction for 12%.

It is not possible to compare these data by industry group with corresponding data for the total number of employers by industry. This is because not all employers are required to regularly report to government agencies. In many states, small employers are exempt from Unemployment Insurance tax, Workers Compensation Insurance requirements, or other regulations that would yield reliable data. California is an exception. Virtually all private sector employers in the state are subject to these types of taxes or obligations.

At the same time, the citations data by industry can be compared with data for all covered employment (U.S. Bureau of Labor Statistics, 2002 c). The three leading industries with covered employment, as measured by the number of such firms, in rank order, are: Services, Retail Trade, and Construction. Their combined national share of the number of employers is 67%. Correspondingly, the same three industries had a combined share of employer sanctions citations was also 67%. However, the rank order

in the share of sanctions differs from that for the number of firms. It was Services, Retail Trade, and Manufacturing (followed closely by Construction).

The INS Case Closed File includes data on the number of persons employed at establishments where a citation was issued. For the U.S. as a whole, the aggregate number of persons employed at cited establishments during the entire 12-year period was 7,839,614. This implies that an average of 653,300 persons per year were working at establishments that were cited, representing roughly 0.5% of the employed work force.

The size distribution of the number of establishment employees at cited firms is shown in Figure 3. More than 37% of all citations were issued to very small firms, those with fewer than five employees.

The median number of establishment employees at cited firms was just eight, meaning half the firms had eight or fewer employees. The average number of employees per firm was much higher, 136, which means that although the number of large employers was small, they accounted for the vast majority of employees.

Citations were mostly issued to employers in a relatively few states. Most notable is that just four states (California, Texas, New York, Arizona) account for more than half of all citations (51%). Table 1 shows the total number of citations for each of the ten leading states, by the state of the cited employer's establishment address.

Table 1. Ten leading states, Employer Sanctions Citations, United States, FY1988-FY2000 (partial), N =57,845, INS Case Closed File, CIS

<u>State</u>	<u>Number of Citations</u>	<u>Per Cent of Total</u>
California	10,091	17.5%
Texas	9,565	16.5%
New York	6,657	11.5%
Arizona	3,300	5.7%
Illinois	2,379	4.1%
New Mexico	2,147	3.7%
Washington	1,479	2.6%
Michigan	1,431	2.5%
Oregon	1,321	2.3%
Florida	1,311	2.3%

It is not known whether these states, and in ranked order, are the leading places of employment of unauthorized workers.

To some extent, one might expect that the share of citations for each state would reflect the state's share of unauthorized workers, or possibly the state's share of foreign-born workers. State-by-state estimates of foreign-born workers have been developed by the Bureau of Labor Statistics (U.S. Bureau of Labor Statistics, 2002 b). These estimates are based on the Current Population Survey. The top three states, in rank order, by the number of foreign-born employed persons, are California, New York and Texas, and their combined share of all such persons in the U.S. is 53%. Thus, the same three states' share of citations (46%) is only slightly less than their combined share of employed foreign-born persons, although the rank order differs.

Employer Sanctions: California

California led the nation in the number of employer sanction citations with 10,091 recorded between FY1988 and FY2000 (partial year). This is not terribly surprising since the state leads the nation in population, employment and number of foreign-born workers. Most observers agree that California likely has more unauthorized workers than any state.

California's share of employer sanctions citations is about 17% of the U.S. total, about half again larger than what would be expected based on population or employment alone. However, California has a much larger share of the foreign-born employed work force (31%) than its national share of population or total employment (U.S. Bureau of Labor Statistics, 2002 b). Thus, it would be expected that vigorous INS inspections would be more likely to turn up possible cases requiring employer sanctions citations in the Golden State than would be indicated by population or employment figures alone.

When analyzed by fiscal year, the California citations are very similar to what was found for the nation as a whole. As shown in Figure 4, the number of cases was quite small in FY1988 and FY1989, rose to a very large number in FY1990, falling off over subsequent years until FY1997 and FY1998, when a substantial increase was recorded. The largest number was recorded in FY1990, at 1,627. Even in FY1997 and FY1998, the number was never again as great, reaching 907 and 1,107, respectively.

Interestingly, the California share of the U.S. total of employer sanctions citations varied relatively little throughout the entire period FY1988-FY1997. In all but two of the ten years of this period, the California share was below the proportion of 17% cited previously. However, the California share rose above this average in FY1998 and rose again, this time sharply, in FY1999, reaching 30%, or nearly twice the long-term average. This is shown in Figure 5, where the annual California share of the U.S. total is presented.

The fraction of all California establishments cited is very small. During the eleven-year period FY1989-FY1999, on average, just 0.103% of all firms were cited.¹

The distribution of citations by industry in California is quite similar as found for the U.S. as a whole. This is shown in Figure 6. However, citations in the Retail Trade industry were the most prevalent in California, followed by Services and Manufacturing. The two leaders accounted for 56% of California citations, virtually the same as in the nation. Manufacturing had 14%, Construction had 12% and Agriculture, Forestry and Fishing accounted for 7%. These figures parallel closely the corresponding figures for the U.S.

Importantly, at the 4-digit SIC level, the leading categories of citations are SIC 5812 (Restaurants & Eating Places), with 1,897 citations, and SIC 7011 (Hotels & Motels), with 651. Altogether, these two categories had fully one-fourth of all California citations. There were hundreds of additional 4-digit SIC codes represented in the INS Case Closed file, and no other had as many 300 citations. Thus, the concentration of citations in the two aforementioned categories must be regarded as significant.

¹ BLS data from the State CEW file were used to determine the average number of establishments for each year. The number of citations for each year was divided by the corresponding number of establishments to obtain figures for all eleven years. The average for the entire period was 0.103%, the maximum was 0.22% (FY1990) and the minimum was 0.03% (FY1989). See U.S. Bureau of Labor Statistics, 2002 c.

The issuance of citations among different industry groups reflected a relatively stable distribution by category. The five leading categories described previously, see Figure 6, were the top five in every year but one (in FY1996, Wholesale Trade had more citations than Agriculture, Forestry and Fishing, and ranked fifth).

The distribution of citations by industry group for California can be compared with the corresponding distribution of the number of establishments. The Golden State requires virtually every employer to provide unemployment insurance for its work force (employers paying less than \$100 in wages and salaries in every calendar quarter are exempt). This comparison is shown in Figure 7, where all figures are expressed as percentages.

There were significantly more citations in Retail Trade than would seem to be warranted by that industry group's share of all establishments. On the other hand, Services was underrepresented in citations as compared with the number of establishments. The following industry groups were over-represented with citations relative to their industry group's share of establishments: Agriculture, Forestry and Fishing; Construction; Manufacturing. Those which under-represented were: Transportation and Public Utilities; Wholesale Trade; Finance, Insurance and Real Estate; Public Administration. Anecdotal data suggest that it is more likely that unauthorized workers were employed in the former categories than in the latter. Thus, the distribution of citations by industry group appears to be not unreasonable.

There was some shifting of rankings in different fiscal years, but overall these were rather minor. When the citations are reviewed by fiscal year and by industry, shown in Figure 8, it is clear that Retail Trade was the leading category in FY1989-FY1991, FY1993, and again in FY1998-FY1999. Services became the leader in FY1992, and FY1994-FY1997 but ranked second in all other years. Manufacturing ranked third in FY1989, FY1991, FY1993-FY1999, and ranked fourth in all other years. Construction ranked fourth in all years except FY1990 and FY1992, when it ranked third, and FY1995, when it ranked fifth. The category Agriculture, Forestry and Fishing ranked fifth in every year, except FY1995, when it ranked fourth, and FY1996, when it ranked sixth. As mentioned previously, Wholesale Trade ranked fifth in FY1996.

The geographic distribution of citations was measured in two ways: by county and by Case Number Prefix, which reflects the INS district office from which the citation was issued. County refers to the county where the citation was issued, not necessarily the same as the county where the principal business address of the firm is located. The Case Number Prefix was assigned by the INS officer who issued the citation, and reflects the locality where the officer is based. The county distribution is best understood by the ranked order of the number of citations. This is shown in Table 2.

It is a complete surprise to find that there were more than twice as many employer sanctions citations issued in San Diego County than in Los Angeles County. Given the enormously greater population and employment in Los Angeles County, it is difficult to understand the preponderance of citations in San Diego County. In particular, the 4-year (1997-2000) average number of establishments was 294,222 in Los Angeles County and 72,594 in San Diego County (U.S. Bureau of Labor Statistics, 2002 c). Thus, based on the number of establishments only, one might have expected four times as many citations in the former county as compared with the latter. The citations data not only does not follow this distribution but it is in the reverse order. In other words, the discrepancy is a

factor of eight in the unexpected direction. Of course, the database itself provides no information explaining why a particular county may be over- or under-represented in the Case Closed File.

Table 2. Top Fifteen Counties, Employer Sanctions Citations, California, FY1988-FY2000 (partial), N=10,091, INS Case Closed File, CIS

<u>County</u>	<u>Number of Citations</u>	<u>Percent of Total</u>
San Diego	3,278	32.5%
Los Angeles	1,544	15.3%
Riverside	822	8.1%
San Bernardino	490	4.9%
Orange	438	4.3%
Alameda	379	3.8%
San Francisco	328	3.3%
Fresno	318	3.2%
Santa Clara	284	2.8%
Sacramento	279	2.8%
Imperial	224	2.2%
San Mateo	195	1.9%
Ventura	176	1.7%
San Joaquin	138	1.4%
Kern	133	1.3%

The geographic distribution of citations can also be examined at a coarser level. Following the California Department of Employment Development (EDD, 2002), each county is assigned to one of six geographic regions: Central Coast, Desert, North Coast, Sacramento Valley, San Joaquin Valley, and South Coast. Table 3 shows the regional distribution of citations and the corresponding regional distribution of the number of establishments. Both sets of data are expressed as percentages.

Table 3. Employer Sanctions Citations and Establishments, by Region (percent), California, FY1988-FY2000 (partial), INS Case Closed File, CIS

<u>Region</u>	<u>Employer Sanctions Citations</u>	<u>Establishments</u>
Central Coast	14.8%	21.7%
Desert	15.2%	6.4%
North Coast	2.0%	3.2%
Sacramento Valley	4.9%	8.8%
San Joaquin Valley	8.8%	9.6%
South Coast	54.2%	47.0%

Note: The regional distribution of the number of establishments is calculated from the 4-year average number (CY1997-CY2000) reported for all counties in each region. Source: www.bls.gov/cew selected for all covered employers in each county in California.

From Table 3, it is clear that the Desert and South Coast were over-represented among citations, and that all other regions were under-represented, relative to the regional distribution of the number of establishments. However, the degree of under-representation of the San Joaquin Valley was only to a slight degree.

A second measure of the regional distribution of citations can be inferred from the Case Number prefix assigned to each case. Each case is assigned a Case Number, of the form:

Case Number = XXXYYEONNNNNN

where XXX refers to a District, Sub-office or Sector Code (the precise referral varied systematically with Fiscal Year in the raw data), YY refers to the Fiscal Year, and NNNNNN is a number, likely to have been assigned sequentially in the course of the year. For example, the XXX prefix ELC refers to El Centro, in Imperial County of the Desert Region (as assigned by EDD), near the Mexican border.

The distribution of Case Number prefixes among the top 15 is shown in Table 4, where the code, corresponding place name, number of citations, and percent of the total are all presented. In this table, no effort has been made to distinguish the use of the prefix as a reference to District, Sub-Office or Sector.

Table 4. Top 15 INS Case Number Prefixes, Employer Sanctions Citations, California, FY1988-FY2000 (partial), INS Case Closed File, CIS

<u>Case Number Prefix</u>	<u>Place Name</u>	<u>Citations</u>	<u>Percent of Total</u>
SND	San Diego	2,341	23.2%
LOS	Los Angeles	1,944	19.3%
SFR	San Francisco	1,485	14.7%
ELC	El Centro	620	6.1%
SAA	Santa Ana	357	3.5%
SAC	Sacramento	313	3.1%
FRS	Fresno	307	3.0%
SNJ	San Jose	280	2.8%
TEM	Temecula	256	2.5%
FRE	Fremont	198	2.0%
RIV	Riverside	198	2.0%
IDO	Indio	192	1.9%
CHU	Chula Vista	186	1.8%
SNM	San Marcos	135	1.3%
SCM	San Clemente	134	1.3%

Once again, the predominance of San Diego is evident, again surpassing Los Angeles.

The size distribution of employment was determined for all California employers cited. The total number of employees at cited California firms was 597,986. The median cited employer had just nine employees, and the average number of employees per cited firm was 59. The detailed results are shown in Figure 9. The distribution of

employment size is very similar to what was found for all cited U.S. employers: most citations were issued to small employers. In fact, 36% of California citations were to employers with fewer than five employees. The corresponding figure for all cited U.S. employers was 37%.

Unlike the U.S. data, California findings can be compared with published data on the size distribution of employment. This is because nearly all California employers provide detailed information concerning their payroll and number of employees on a quarterly basis for state and federal agencies, which aggregate the data and publish summaries (U.S. Bureau of Labor Statistics, 2002 c). Only the very smallest employers, those paying less than \$100 in wages or salaries each calendar quarter, are exempt from reporting.

Figure 10 shows the comparison of the share of citations by size of the employer vs. the distribution of establishments by size of employment. The share of citations among the smallest employers (0-4 employees) is about half of the corresponding share of all California establishments. The larger the size of employment, the smaller the proportionate representation of cited firms. Only for firms with 5-9 or 10-19 employees does the share of citations roughly correspond to the share of establishments. Among firms with 1,000 or more employees, the share of citations was 1.0%, but the share of establishments is ten times smaller, 0.1%. Thus, a disproportionately large number of employer sanctions citations involved the largest employers in the state.

A measure of the seriousness of particular employer sanctions citations is provided by the data on fines assessed and collected. In California, 773 (7.0%) cases involved fines collected. Figure 11 shows the record of these more serious citations, by Fiscal Year. Unlike the pattern of citations cases, the cases involving fines collected reached a maximum in FY1989 and FY1990, and then fall off sharply in subsequent years. In contrast, the number of all California cases (see Figure 4) peaked in FY1990, then fell off, and increased again in FY1997 and FY1998 to two-thirds the annual number in FY1990. There was no such annual pattern of fines collected cases: they simply fell off after FY1990 and never reached more than 11% of that year's total in FY1997 and FY1998.

The record of total annual amount of all fines collected shows a pattern similar to that found for the annual number of cases involving fines collected. This is shown in Figure 12. After reaching a peak of about \$564,000 in the total collected in FY1990, the annual amount of such fines declined in subsequent years, and was just \$8,000 by FY1998.

Employers of Hired Farm Workers: California

The primary focus of this report is the impact of employer sanctions on California agricultural employment. Within the industry group Agriculture, Forestry and Fishing are 726 citations cases. However, only some of the cited firms are employers of hired farm workers. By definition (Villarejo, 2002), a 'hired farm worker' is a person directly engaged in the production of an agricultural commodity for sale, termed 'primary agricultural activity' in Federal law. The employer may be a farm operator, or may be a non-farm business providing an agricultural service on a farm. Among the most important of the latter are farm labor contractors.

The distribution of the citation cases within the industry group Agriculture, Forestry and Fishing by category of employer is shown in Figure 13. Somewhat less than half of the 726 employers do not have hired farm workers on their payroll. In fact, 272 cases involve providers of lawn and garden services, most often for private homeowners.

There were 425 cases involving employers of hired farm workers, or 3.9% of all California cases. Of that total, 255 citations were issued to farm operators, either crop or livestock farmers. Another 140 were issued to farm labor contractors, and 30 were issued to other providers of on-farm agricultural services. Thus, on average during each year represented in the database, there were 21, 12, and 2.5 citations issued to farm operators, farm labor contractors and to other providers of on-farm services, respectively. Table 5 compares the number of citations per year to the number of establishments of these types (12-year average), and yields a computed fractional share of firms that were cited.

Table 5. Sanctioned Employers of Hired Farm Workers and Establishments, California, FY1988-FY2000 (partial), INS Case Closed File, CIS

<u>Employer</u>	<u>Citations</u>	<u>Establishments</u>	<u>Percent Cited per Year</u>
Farm operator, crop	198	17,489	0.09%
Farm operator, livestock	57	4,206	0.11%
Farm labor contractors	140	1,361	0.86%
Other on-farm service	30	1,857	0.13%

The most important finding shown in Table 5 is that farm labor contractors were *eight times more likely to have been cited* during this period than either farm operators or providers of other types of on-farm agricultural services.

The annual pattern of citations issued to employers of hired farm workers is shown in Figure 14. The number of cases reached a peak in FY1991, then fell off, but increased again in FY1994 and FY1995, then fell off again, but rose again sharply in FY1999. In most respects, this pattern is very similar to what was found for all California cases. In fact, some 30% of all citations to all types of California employers were issued in the four-year period FY1996-FY1999, whereas about 26% of all citations issued to California employers of hired farm workers were issued in the same period.

A second measure of employer sanctions activity is the levying of fines and collections of those fines. Altogether, 773 employer sanctions cases in California resulted in a fine being levied and collected. Of those presumably more serious cases, 40 (5.2%) involved employers of hire farm workers.

Since employers of hired farm workers were found to account for 3.9% of all California citations, the fact that they represented 5.2% of all cases involving fines levied and collected suggests that employers of hired farm workers were somewhat disproportionately involved in the most serious cases.

Once again, the annual pattern of cases involving fines collected from employers of hired farm workers is very similar to the pattern of all citations in California. Figure 15 shows the number of cases involving fines collected from employers of hired farm workers by fiscal year. While the largest number of such cases was in FY1996, the fact of the matter is that there were 12 cases in the period FY1996-FY1999, or 30% of the

total for all years, which is the same percentage (30%) as was found for all citations to all types of California employers.

Surprisingly, employers of hired farm workers who were cited had an aggregate total of 114,791 employees, or 19% of all employees of California cited firms. Thus, while these employers represented just 3.9% of those cited, they accounted for a disproportionately large share of employees, roughly one-fifth of the total.

The median number of employees of these firms was 30, more than three times larger than for all California cited firms, and the average number of employees was 273, more than four and one-half times larger. Thus, we conclude that cited employers of hired farm workers were, on average, much larger employers than is typical for the state, or for all cited firms.

Importantly, the size of employment data shows that cited farm operators had, on average, many fewer employees than did cited farm labor contractors. Cited farm operators accounted for 39,555 employees, or an average of 155 workers per firm. But cited farm labor contractors had an aggregate of 70,196 employees, and averaged 501 employees per firm, more than three times larger than the average for cited farm operators. Thus, the cited farm labor contractors were very much larger, on average, than were either all California cited firms or all U.S. cited firms.

Discussion

California firms employing hired farm workers and who were cited for violations of the employer sanctions provisions of IRCA can be characterized as large employers and more likely to have been fined. The most important sub-group were farm labor contractors, who were found to have been cited more than eight times as frequently (0.857% per year) as either all cited California firms (0.103%), or cited California farm operators (0.098%).

The sharp fall-off of employer sanctions citations among all California firms and employers of hired farm workers is difficult to reconcile with data on the reported share of unauthorized workers in the labor force. In particular, the National Agricultural Worker Survey (NAWS) found that 9% of hired crop farm workers were unauthorized in FY1990 and FY1991 (Rosenberg, 1993). By FY1995, FY1996, FY1997, the NAWS found that 42% were unauthorized (Rosenberg, 1998).

Comparing this sharp rise in the proportion of hired crop farm workers who said they were unauthorized with the sharp decline in the number of citations and fines issued to firms employing such workers demonstrates that the INS employer sanctions effort was sharply reduced in the recent period. Obviously, this data alone strongly suggests that the INS enforcement effort may have been curtailed. Importantly, the data also demonstrates that agriculture was not treated differently than other industries. That is, the fall-off in enforcement activity in agriculture was nearly identical as was found for all firms.

One of the more difficult questions is the failure of IRCA to hold employers responsible even if the documentation submitted by their employees in support of Form I-9 was forged. The "IRCA loophole," holds employers to be responsible under the employer sanctions provisions only if they "knowingly hire" unauthorized workers. Thus, an employer can argue that forged documents submitted by a prospective employee

in support of Form I-9 appeared to be authentic, and be freed of responsibility under employer sanctions.

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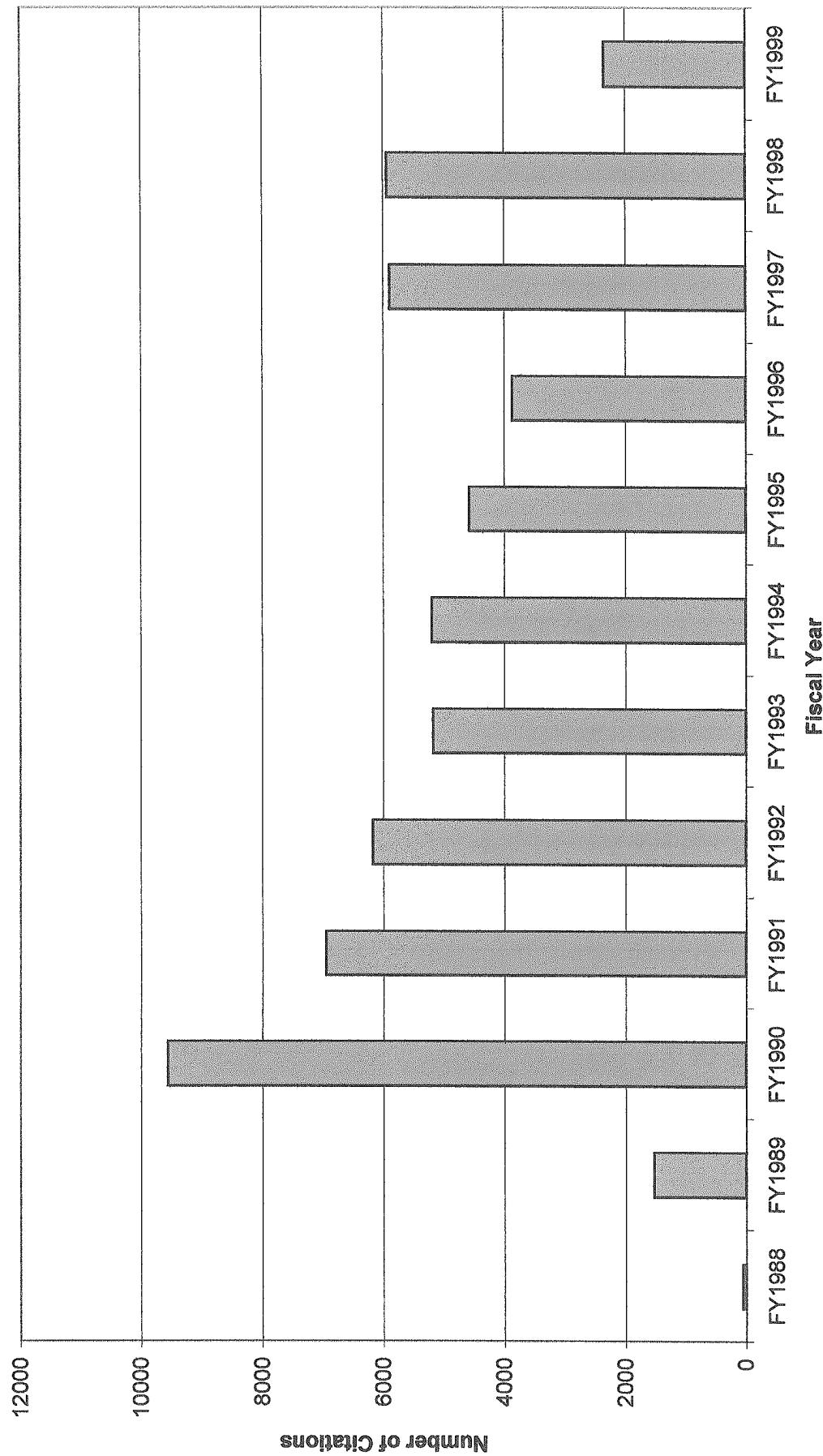
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Figure 14. Employer Sanctions Citations, Employers of Hired Farm Workers, by Fiscal Year, California, INS Case Closed File, CIS.

Figure 15. Employer Sanctions Citations with Fines Collected, Employers of Hired Farm Workers, by Fiscal Year, California, INS Case Closed File, CIS.

**Figure 1. Employer Sanctions Citations, Number of Citations by Fiscal Year, United States,
INS Case Closed File, CIS**



**Figure 2. Employer Sanctions Citations, Number of Citations by Industry, FY1988 - FY2000
(partial), United States, INS Case Closed File, CIS**

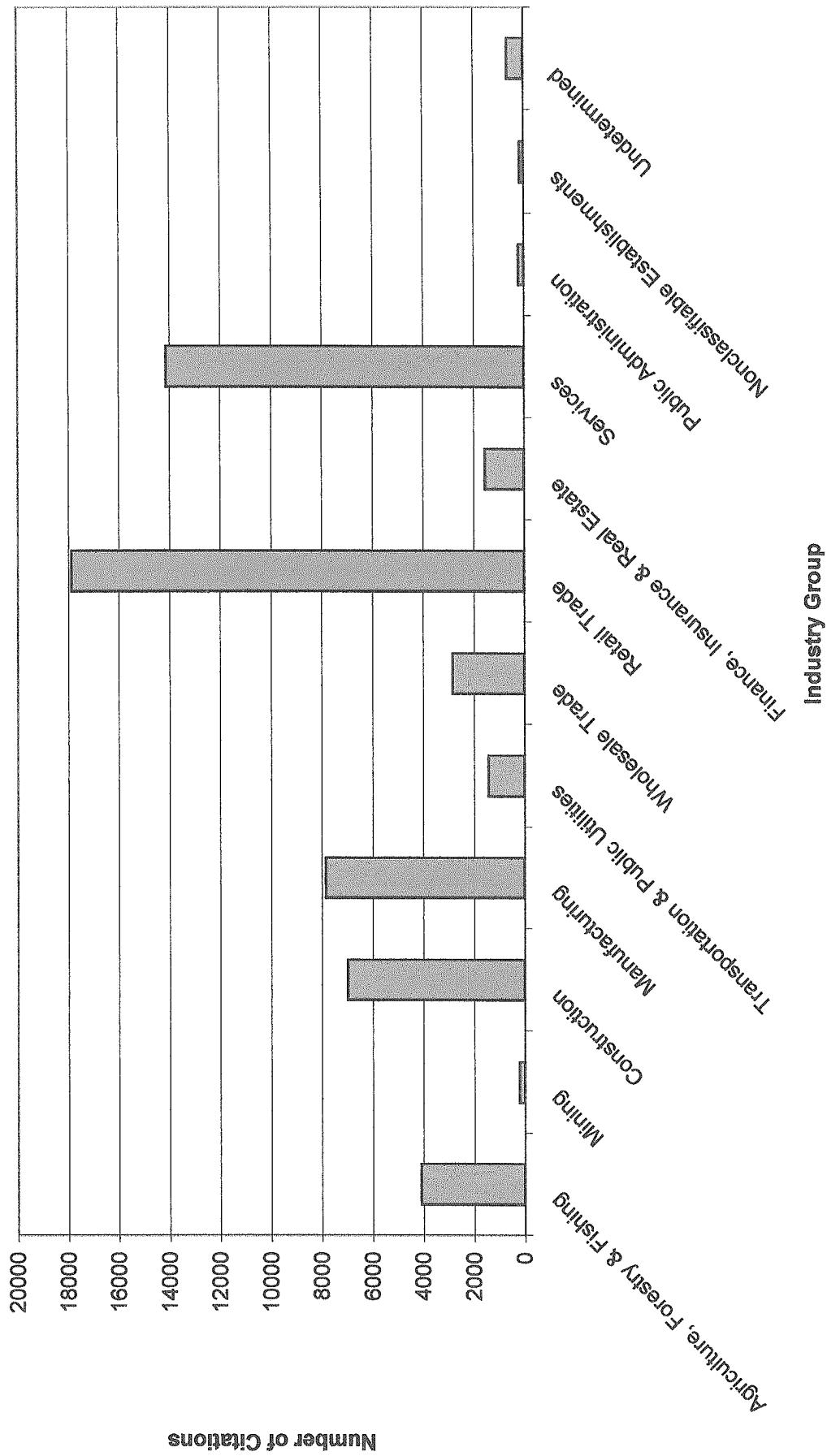


Figure 3. Employer Sanctions Citations, Number of Citations by Size of Employment, United States, FY1988 - FY2000 (partial), INS Case Closed File, CIS

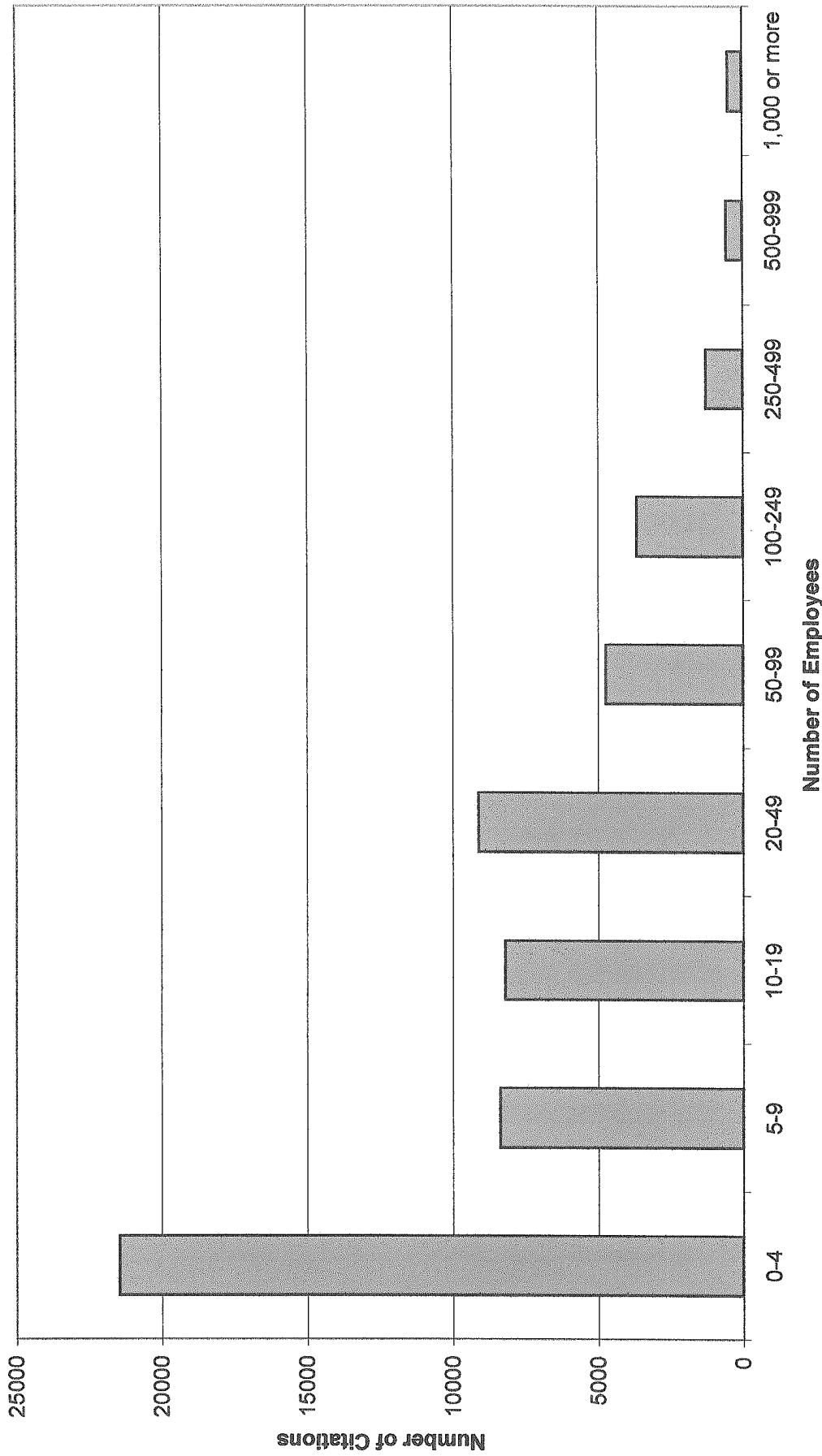


Figure 4. Employer Sanctions Citations, All Industries, by Fiscal Year, California, INS Case Closed File, CIS

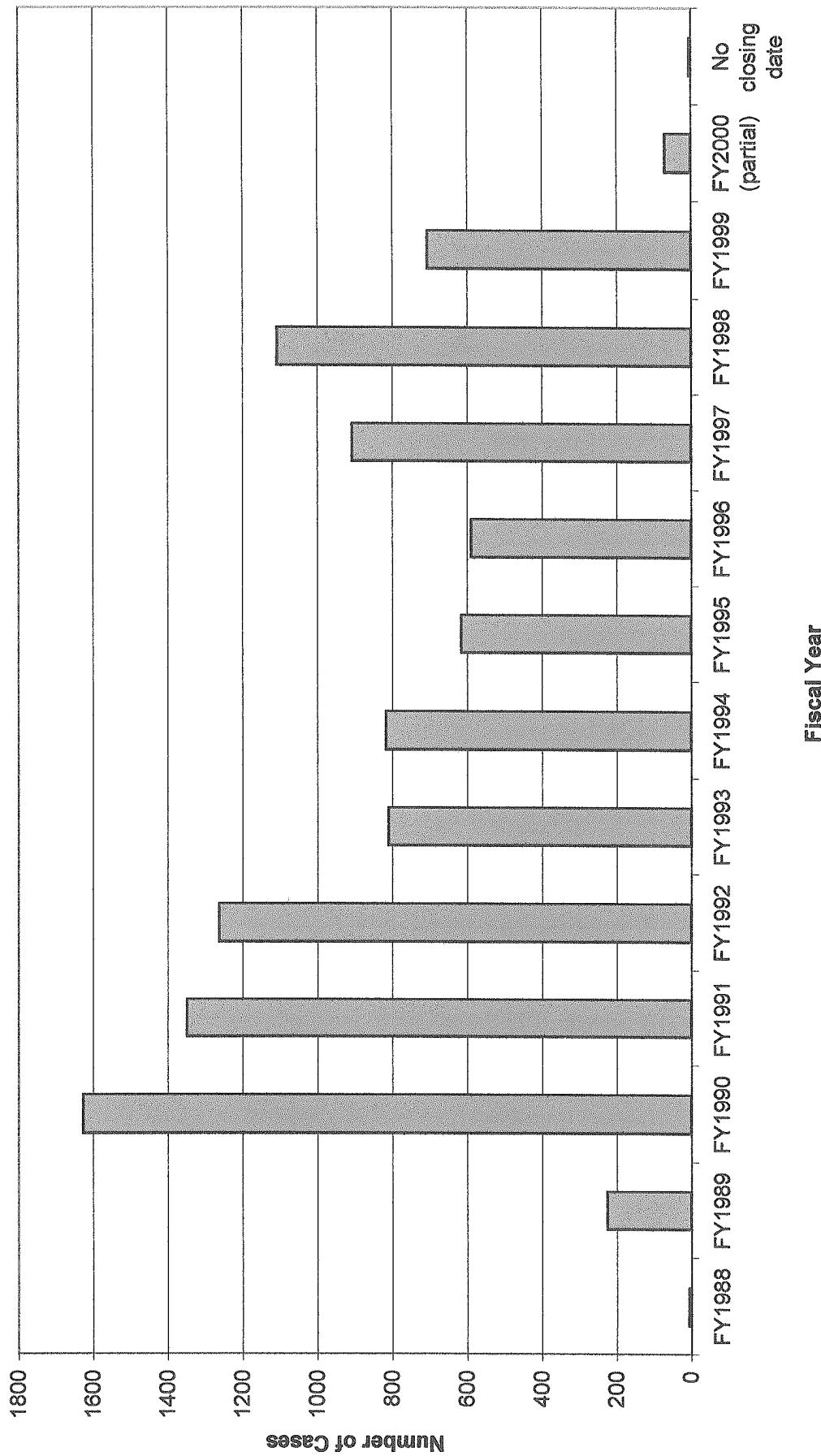
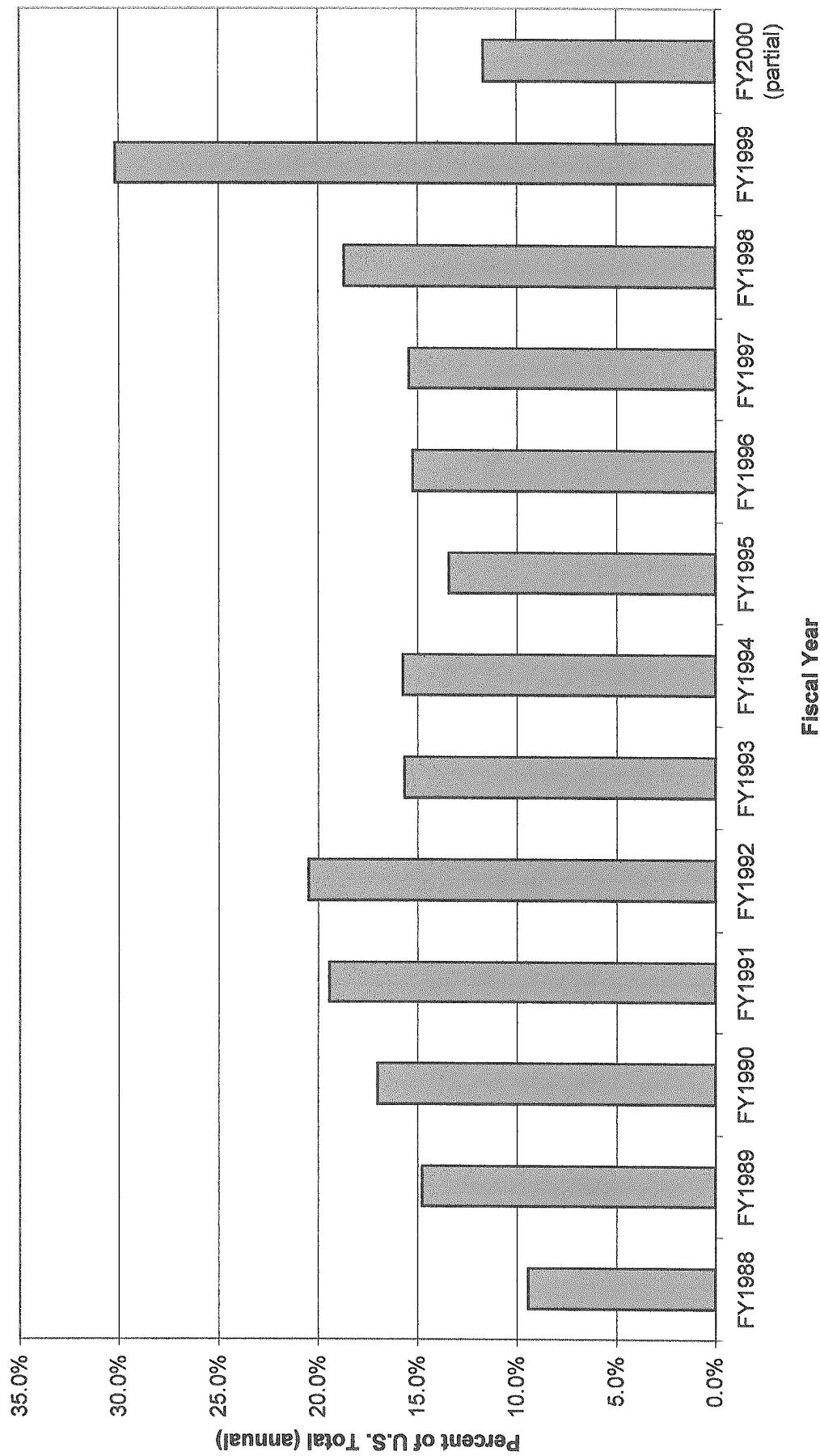
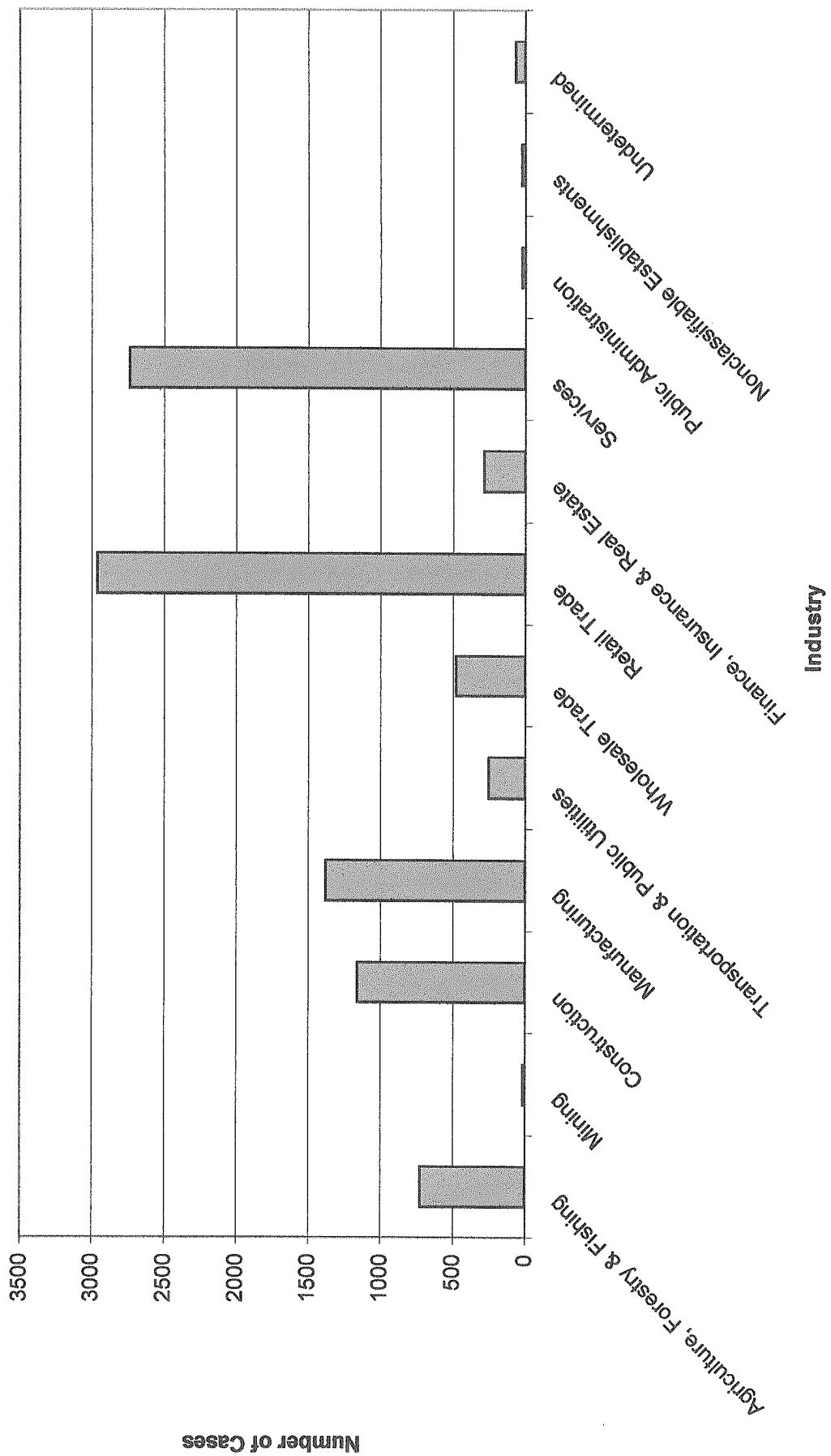


Figure 5. Employer Sanctions Citations, California Share of U.S. Total (percent), by Fiscal Year, INS Cased Closed File, CIS



**Figure 6. Employer Sanctions Citations, by Industry Group, California, FY1988-FY2000
(partial), INS Case Closed File, CIS**



**Figure 7. Employer Sanctions Citations and Establishments, by Industry Group, California,
FY1988-FY2000 (partial), INS Case Closed File, CIS**

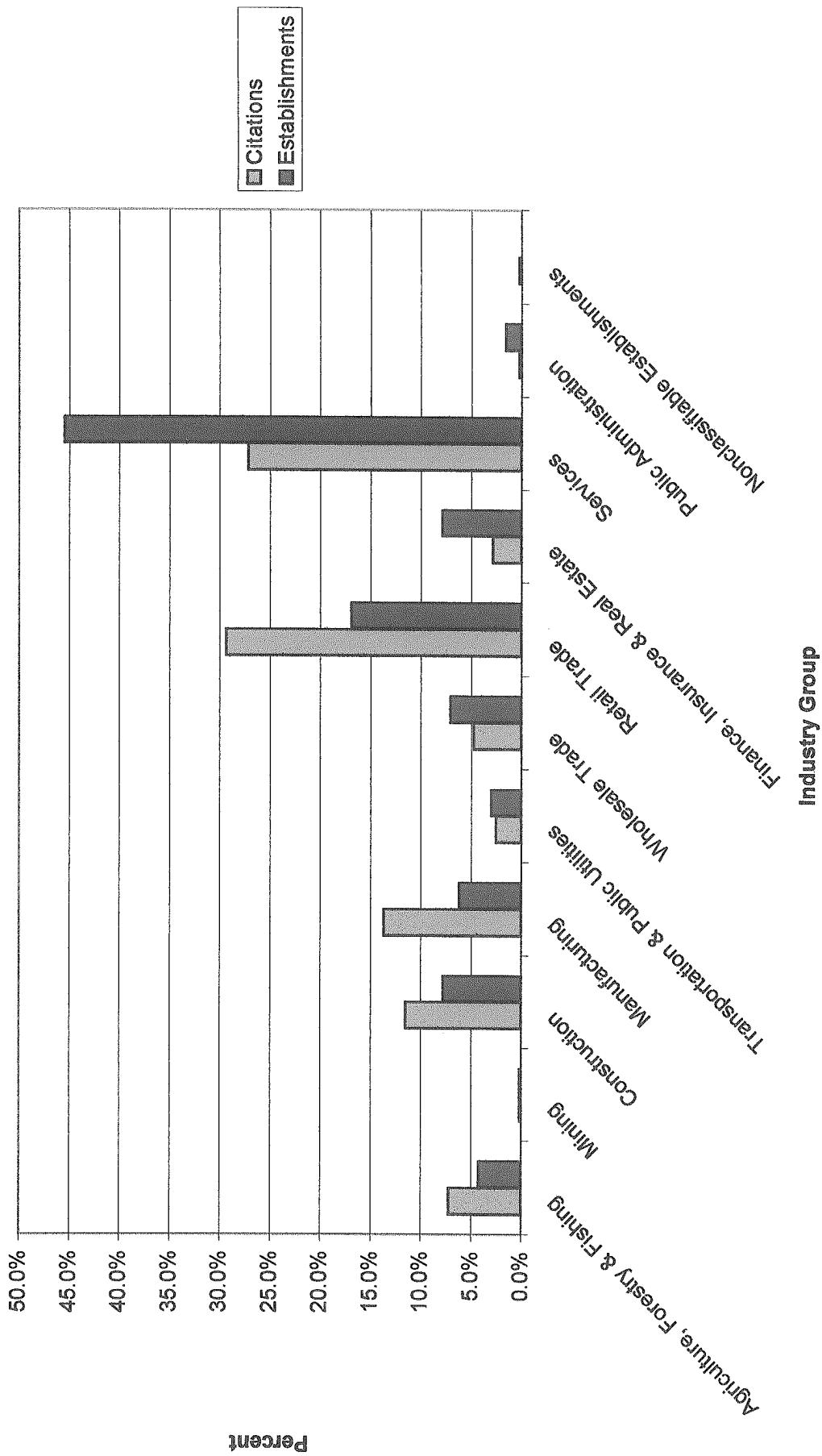


Figure 8. Employer Sanctions Citations, Number of Citations by Industry Group and Fiscal Year, California, INS Case Closed File, CIS

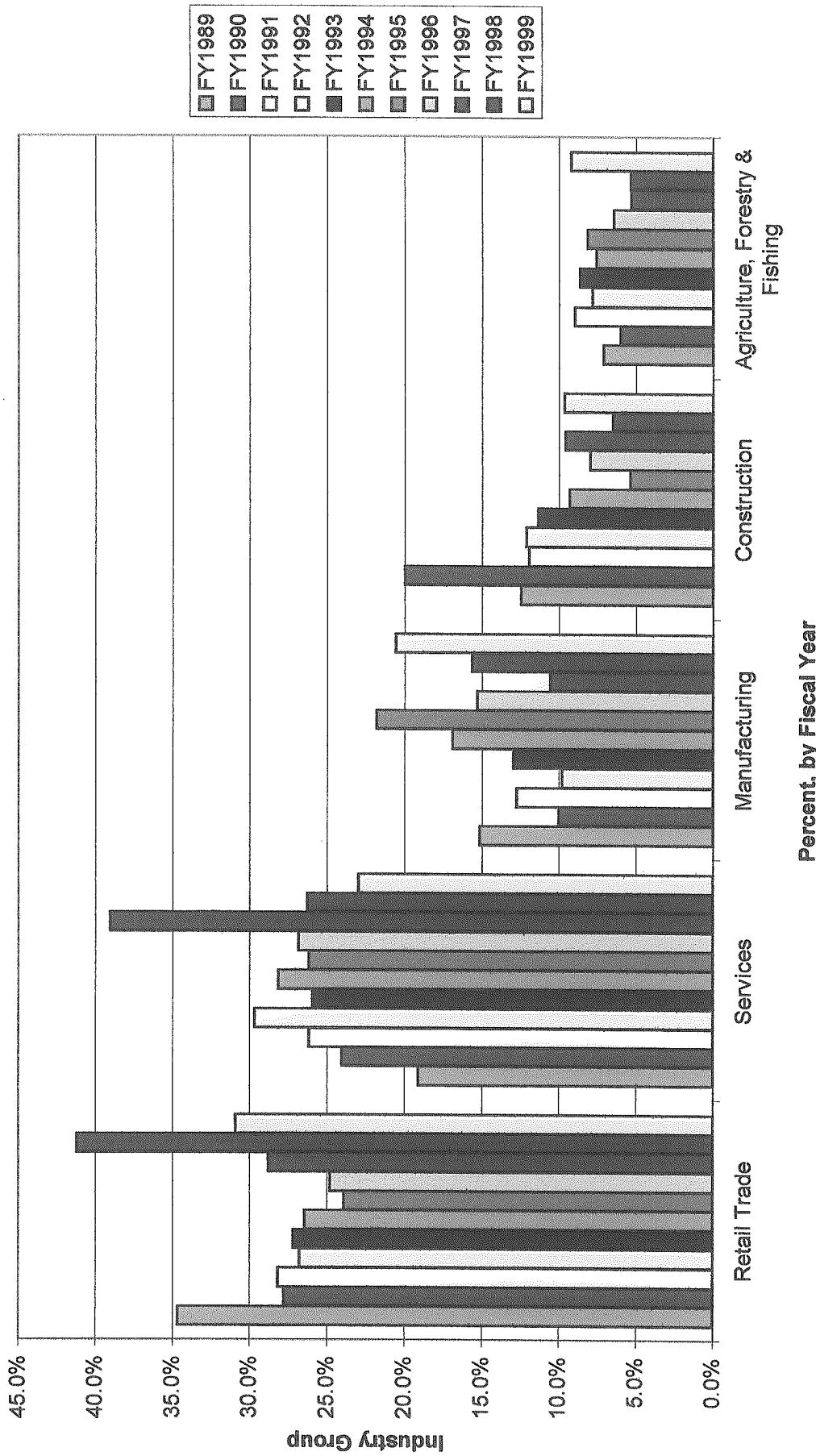
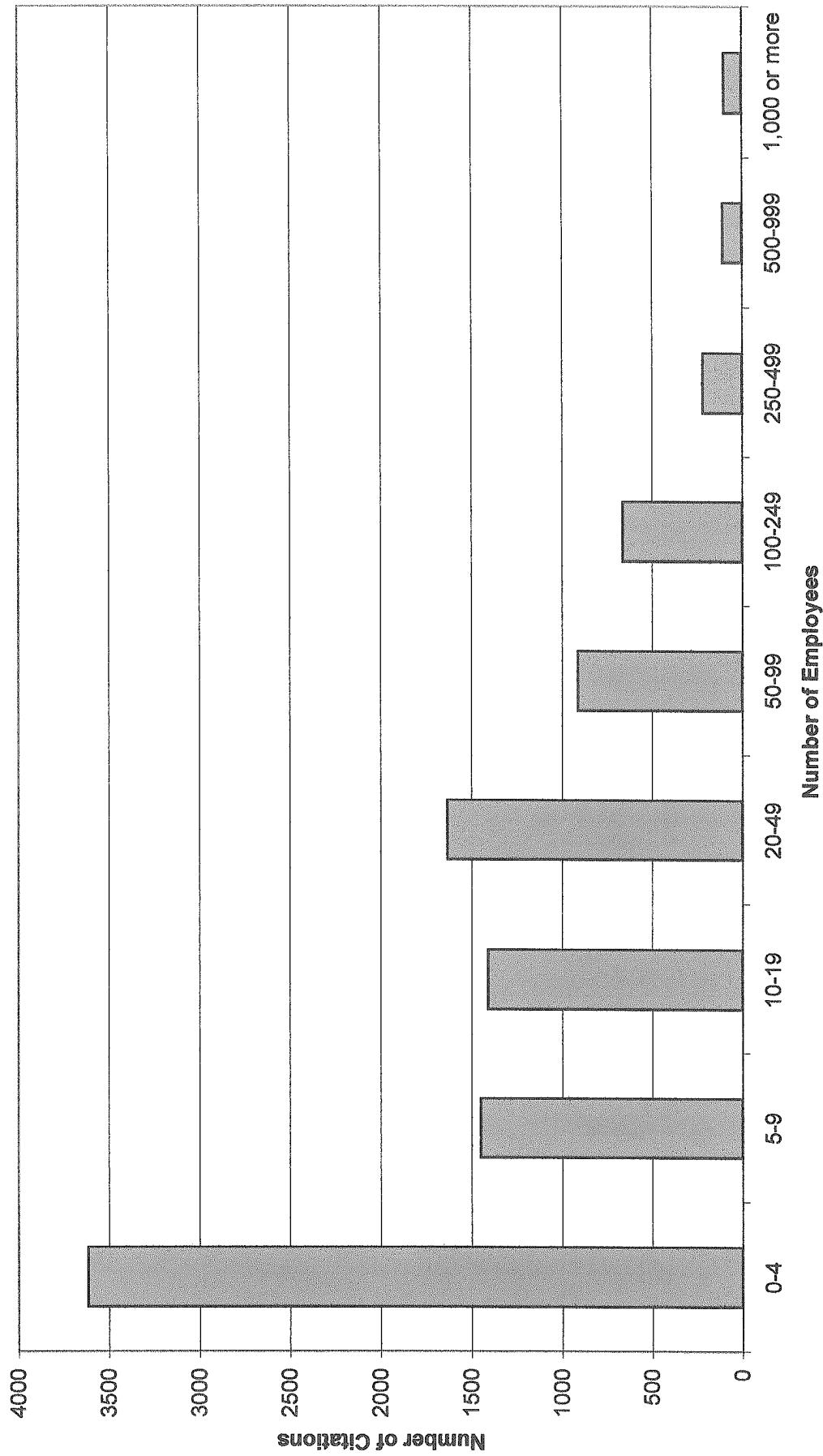


Figure 9. Employer Sanctions Citations, Number of Citations by Size of Employment, California, FY1988-FY2000 (partial), INS Case Closed File, CIS



**Figure 10. Employer Sanctions Citations and Establishments, Percent by Size of Employment,
California, INS Case Closed File, CIS; BLS CEW file**

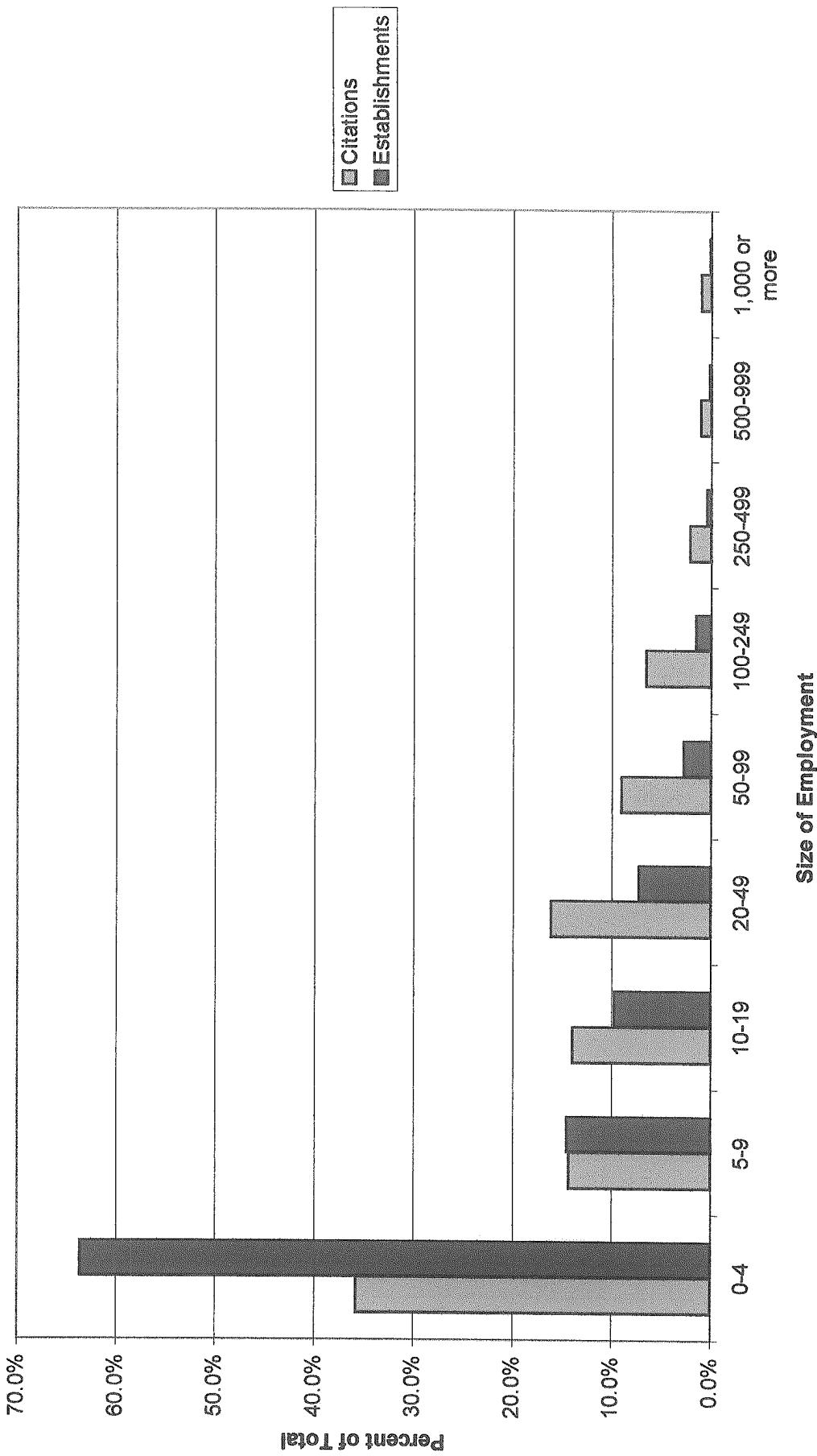


Figure 11. Employer Sanctions Citations with Fines Collected, All Industries, by Fiscal Year, California, INS Case Closed File, CIS

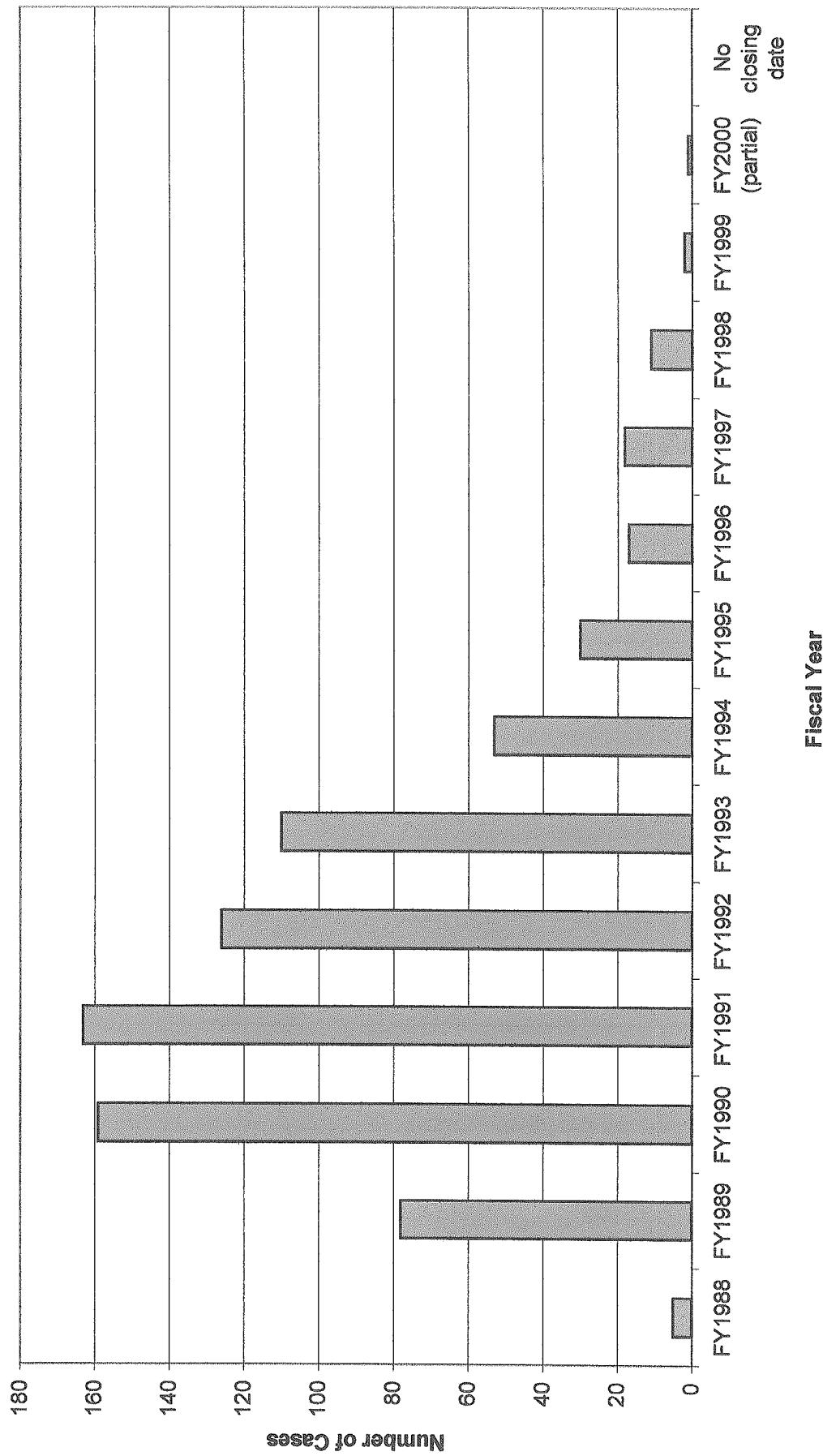


Figure 12. Employer Sanctions Citations, Total Fines Collected, All Industries, by Fiscal Year, California, INS Case Closed File, CIS

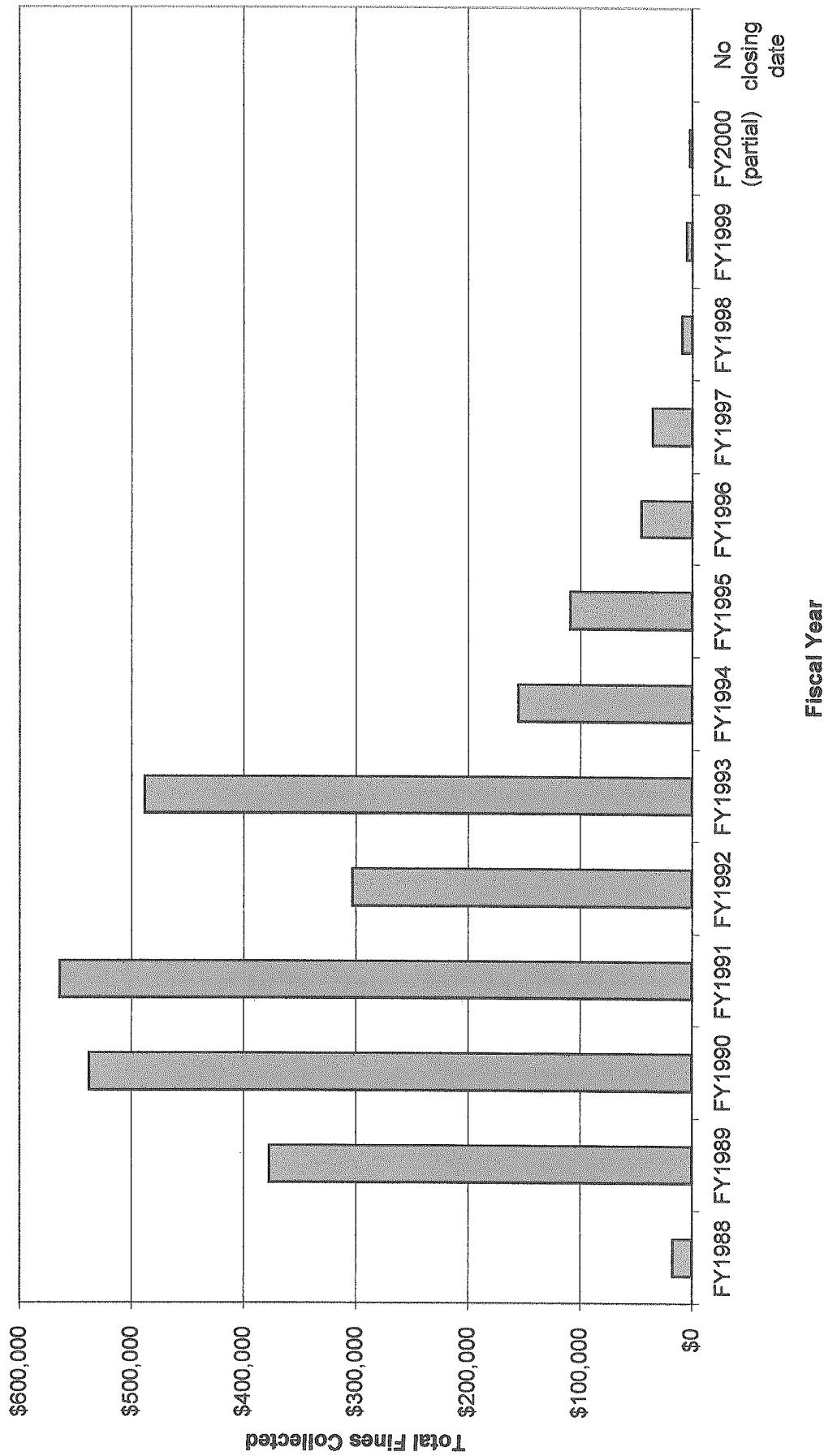


Figure 13. Employer Sanctions Citations, Agriculture Forestry & Fishing Industry Group, California, FY1988-FY2000 (partial), INS Case Closed File, CIS

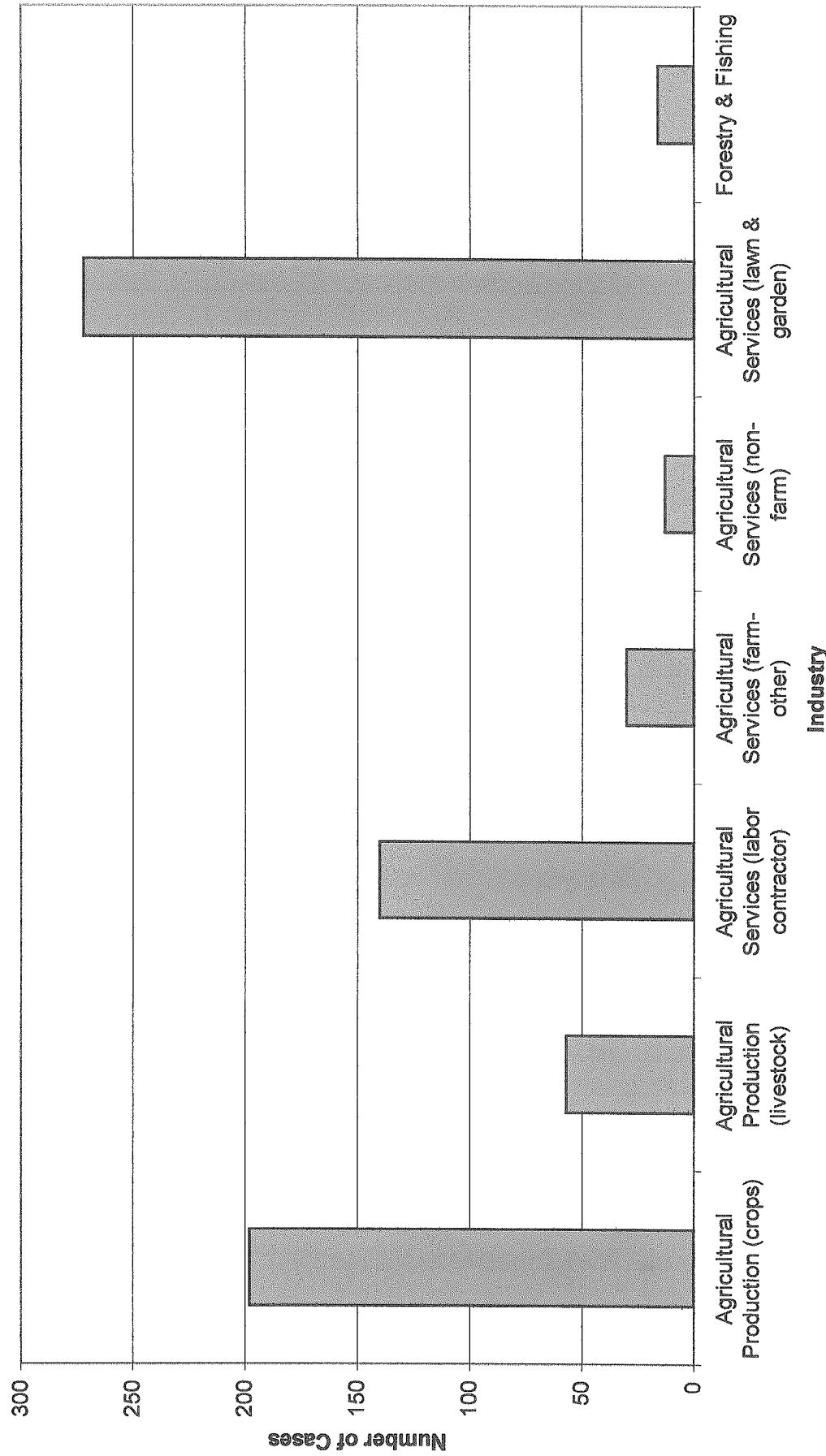


Figure 14. Employer Sanctions Citations, Employers of Hired Farm Workers, by Fiscal Year, California, INS Case Closed File, CIS

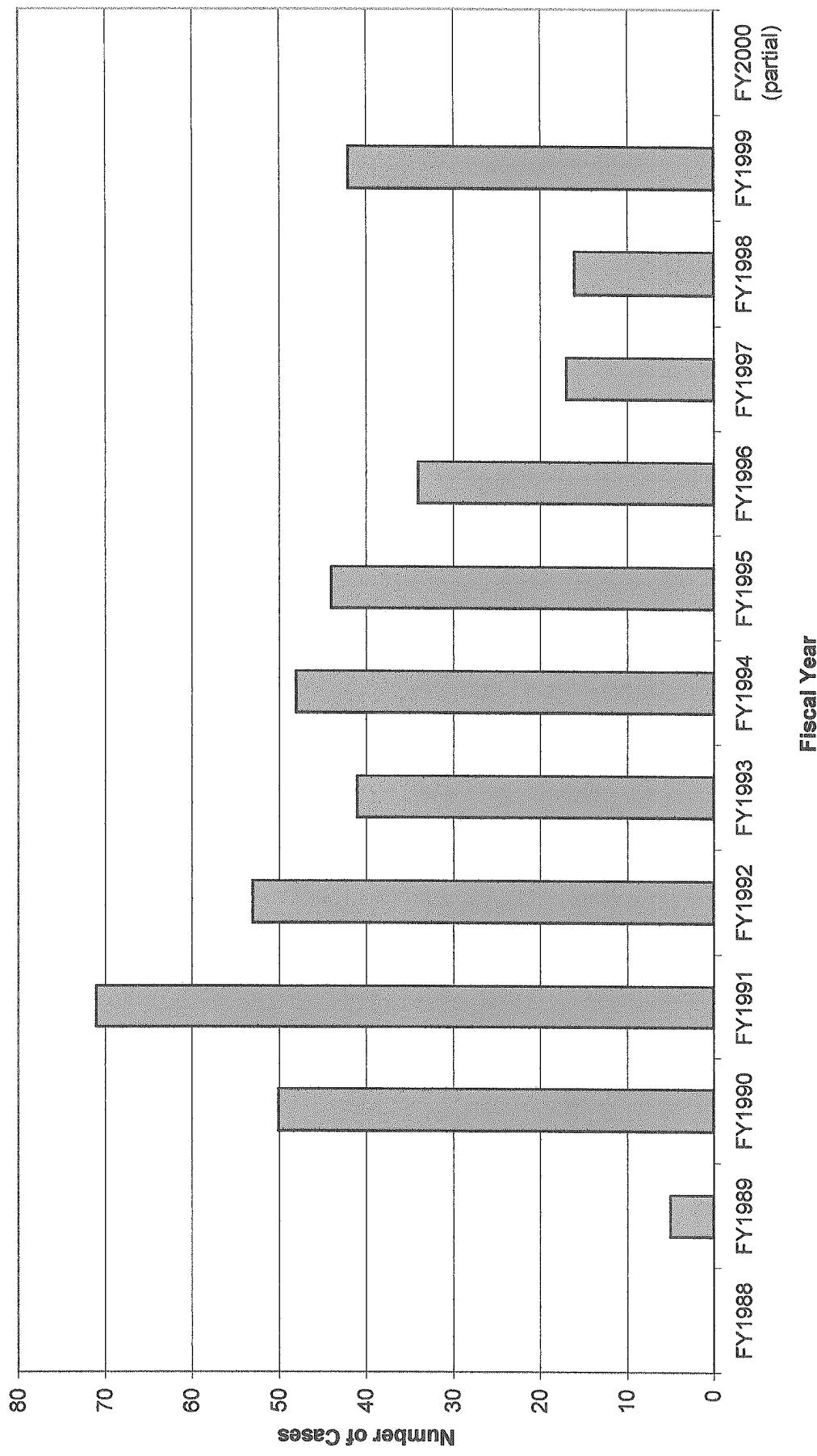


Figure 15. Employer Sanctions Citations with Fines Collected, Employers of Hired Farm Workers, by Fiscal Year, California, INS Case Closed File, CIS

