

QSS20 Final Project Memo 1

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1 What I learned

The WHD assumes significant oversight responsibilities over migrant workers, yet they receive little help in the way of resources or staffing. Although they have over 148,000,000 employees under their purview (including 200,000 H2-A migrant workers), they have fewer than 1,500 employees. (In contrast, the IRS has 75,000 employees.) The WHD tracks “Compliance Action Data,” which is posted on via the Department of Labor. These datapoints represent the most comprehensive public list of violations of the rights of H2-A workers. In addition to this dataset, the Quarterly Census of Employment and Wages (QCEW) establishes the universe of employers, as determined by registry with state unemployment agencies. The Census of Agriculture has a seemingly larger set of registered farm employers as well.

The EPI conducted many analyses of these data, finding that a small number of employers represent a large fraction of offenses. However, few offenders exhibit consistent patterns of offense or compliance. Employers who use farm labor contractors (FLCs) are disproportionately likely to commit offenses. Finally, detailed inferences about the number of employers who actually commit offenses are very hard to do – only 1 percent of agricultural employers get investigated each year, and that percentage is even lower in other industries.

2 Gaps and questions

The EPI report highlights FLCs, but mentions that they are somewhat of a black box when it comes to their worker placement. The EPI is concerned with the commodities that the FLC workers farm, and I wonder if there are sales datasets that might allow us to merge commodity with worker type.

I also found the EPI report’s focus on the Rio Grande Valley interesting, given our work with our SIP partner. They used the RGV to illustrate the lack of patterns between compliance and violation, but I wonder if there are any patterns where employers are more likely to commit violations after some period (months, years) since their last inspection.