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Director
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Department of Labor

September 2, 2025

**RE: Recission of Final Rule: Improving Protections for Workers in Temporary
Agricultural Employment in the United States**

Dear Administrators Pasternak, Vitelli, and Navarrete,

By notice issued on 7/2/25, the Department of Labor (DOL, henceforth “the Department”) has published proposals for rescinding rules published by the Department on April 29, 2024, governing components of the H-2A guest workers program. **Hispanic Federation (HF)** respectfully submits the following comment in response to DOL request for comment on the Recission of Final Rule, DOL Docket No. ETA-2025-0007, RIN 1205-AC25. Ultimately, Hispanic Federation strongly advises the Department against many of the proposed recissions as they may be reasonably expected to not only deteriorate working conditions for both guest and native workers, but also are predictably poised to reduce economic output in the U.S.’s agricultural sector, undermining both working households and national strategic planning.

1. Hispanic Federation Interest in Rule

Hispanic Federation is a nonprofit membership and advocacy organization with a network of over 850 organizations across the country. HF is committed to empowering and advancing the Hispanic community, with a focus on low-income, marginalized, and immigrant Latinos. With

programs in 43 states and territories, including Puerto Rico, the U.S. Virgin Islands and the District of Columbia, HF's focus areas include immigration, economic empowerment, civic engagement, disaster relief, philanthropy, education, health, and the environment. HF also maintains ongoing immigration advocacy and welcome campaigns and meets the organizational development needs of its member agencies through grant-making and capacity-building assistance.

Per DOL's invitation to interested parties to submit relevant written data, views, or arguments on the proposed recission, we address here the potentially harmful consequences of many of the proposals at hand, including in reducing American wage growth, economic output, and undermining compliance with labor law. We also note optimism concerning several of the statutes the Department has elected to retain and reinforce as beneficial to workplace safety and reducing administrative overhead.

2. Background and Benefits of Supporting H2A Regulations and Mutual Strengthening of Program Obligations

Since its inception in 1952 in response to the closure of the bracero program, the H-2A program has addressed clear needs for flexible, skilled labor in American agriculture. Following the rapid expansion of use of the program in the 1990s, H-2A workers have become an essential part of the American agricultural sector. Indeed, in recent years, H-2A workers have accounted for a full 25% of all workers employed in U.S. agriculture.¹ Furthermore, while the program has occasionally drawn scrutiny for its economic efficacy, research validates that it has proven largely successful at balancing complex policy goals. For instance, areas with widespread adoption of the H-2A program have seen statistically significant increases in housing activity,² while recent scholarly work has affirmed that the program as implemented and recently revised as not only failed to produce feared suppressive wage effects on non-H2A workers,³ but that in fact improved wage and material conditions for H-2A workers in fact increases rates earned by non-H2A workers.⁴

As such, the H-2A program may be viewed as a largely successful workforce expansion program that benefits not only workers but also local communities and agricultural businesses, and therefore the sector as a whole. Nonetheless, employers registered under the program have inconsistently upheld their statutory obligations in exchange for the privilege of employing guest workers. Journalistic and scholarly research both suggest that H-2A workers are routinely confronted with illegally unsafe work environments, inadequate housing conditions, and

¹ Jeff Luckstead and Stephen Devadoss, "The Importance of H-2A Guest Workers in Agriculture," *Choices*, Vol. 34, No. 1, 2019. 3.

² Marcelo Castillo and Diane Charlton, "Housing Booms and H-2A Agricultural Guest Worker Employment," presented at the 2021 International Conference of Agricultural Economists, Online.

³ Candice Yandam Riviere, "Regulatory Changes and Labor Market Concentration in the US Agriculture Sector: Evidence from H-2A Workers," from Proceedings of the LERA 2023 Meetings; Isabella J. Cheng, "Reforming H-2A: Protecting Migrant Workers Before arrival on U.S. Farms, Duke Law Journal, Vol. 74, 2025.

⁴ Zachariah Rutledge and Marcelo Castillo et al., "H-2A Adverse Effect Wage Rates and U.S. Farm Wages," *American Journal of Agricultural Economics*, 2025.

noncompliant nutritional provisions.⁵ Such exploitative labor environments are a product of the frequently monopsonic hiring conditions which characterize H-2A employers.⁶ The prospect that employers might drive down wages for American, non-H2A workers by skirting workplace requirements has long been one of the key challenges faced by program administrators.⁷ In turn, past reforms confirm the proposition that regulations bringing labor conditions among H-2A workers into more direct alignment with the labor environments of non-H2A workers are one of the most effective ways to protect both the health and safety of H-2A workers and the financial prospects of non-H2A workers.⁸ These perspectives on the program's successes and opportunities inform Hispanic Federation's comment, and our desire to ensure that the H-2A program remains successful while recognizing the continuing ability to improve upon major programs.

3. Support for Protection from Passport Withholding

Hispanic Federation lends our full support to the Department's proposal to maintain clear restrictions on punitive withholding of passports by H-2A employers. As the Department noted, involuntary confiscation of H-2A workers' passports serves no legitimate purpose, and instead severely increases the risk of exploitative working conditions. Indeed, Hispanic Federation is heartened by the Department's recognition of essential and inalienable rights to movement by H-2A workers. A similar commitment to guaranteeing freedom of movement similarly informs our recommendations below.

4. Support for Overtime Transparency

Hispanic Federation likewise ardently supports the Department's determination that previously proposed rules mandating transparency for overtime pay and requirements should be maintained. As the Department noted, these regulations impose a negligible cost onto H-2A employers in exchange for a meaningful augmentation to the ability of potential non-H2A workers both to ascertain interest in agricultural work positions and to augment their negotiating position for alternative positions. In turn, this buttressed position for American workers will facilitate local economic growth in those areas that employ the greatest concentration of H-2A workers.⁹

We further note that these regulations are of clear value to H-2A workers themselves who are similarly more empowered to make informed decisions about which positions to pursue, potentially boosting the ability of smaller entities to compete for a limited labor supply. While

⁵ See, for instance, Cheng, 2025 and <https://www.theguardian.com/us-news/2024/oct/02/h2a-worker-program-migrant-farm-food> (Accessed 8/1/25.) Indeed, Hispanic Federation's own fieldwork with visa-holding workers in North Carolina and New York confirms that individuals are often forced into illegally inadequate housing, marked by moldy sheets, cramped quarters, and dangerous pathogen exposure.

⁶ Eric M. Gibbons et al., "Monopsony Power and Guest Worker Programs," Institute of Labor Economics Discussion Paper Series: January, 2019.

⁷ Castillo is again instructive here.

⁸ See: Rutledge et al., 2025.

⁹ Audrey Holtkamp and Peter F. Orazem, "H-2A Wages and Livestock Farm Labor Demand," *Journal of Agricultural and Resource Economics*, 2024, as well as Rutledge et al., 2025.

workers may often learn of overtime benefits through word of mouth, the reach of word of mouth is limited for H2-A contracted workers, and is of limited guarantee to both H-2A and non-H-2A workers. Additionally, advertising overtime opportunities and requirements in keeping with federal regulatory obligation will facilitate hiring conversations through proactive clarification. Thus, the proposed guidance not only supports the underlying policy mission of the H-2A but is necessary for effective regulation of proactive overtime guarantees. Indeed, Hispanic Federation urges the Department to consider expanding these requirements to encompass information about Prevailing Wage and Adverse Effect Wage Rates (AEWR's), including the prospect for changes to these rates over contract periods to build upon these successes.

5. Safety Regulations as Beneficial to non-H2A workers

The Department proposes rescinding several recently implemented safety regulations, including universal seatbelt requirements, housing protections, and guaranteed access to health-care providers. Hispanic Federation strongly opposes rescinding such rules, including those at §655.132(e)(1), §655.135(h)(1)(v), and reversing the language of § 655.122(h)(4). By and large, the Department exclusively cites qualitative concerns about compliance costs in these proposals, while entirely failing to address the underlying concerns which led to the initial introduction of these provisions in June 2024. As such, the Department fails to provide evidence that the concerns underlying these regulations have been resolved.

The Department's consideration of proactive and mandatory requirements for seatbelts typifies these oversights. All states and territories in the U.S. with the exception of New Hampshire require adults to use seatbelts when a motor vehicle is active.¹⁰ Indeed, the vast majority of states practice primary enforcement of seatbelts, including those states which employ the largest proportion of H-2A workers.¹¹ In light of the near universal requirement for adult seat belts across the United States, the Department's suggestion that H-2A employers refer to state and local ordinance in determining relevant policy actually imposes a *greater* research burden to prospective employers than an overarching federal regulation that merely collates standard requirements. The Department's proposal to rescind mandatory seatbelt provisions of the H2-A program's rules is rendered all the more puzzling by the Department's own citation of the proven safety benefits of seatbelt use.¹² The Department cites concerns stemming from the *Barton* case that failing to regulate the use of seatbelts will not have a deleterious effect on the working conditions of non-H2A workers. This perspective flies in the face of a vast body of research suggesting the exact opposite – that a degradation of workplace safety standards in one portion of an economic sector will tend to lower them elsewhere.¹³ Thus, the Department's proposal will

¹⁰ Governors' Highway Safety Association, "Seat Belt Use," <https://www.ghsa.org/state-laws-issues/seat-belt-use> (Accessed 8/1/25.)

¹¹ Luckstead and Devadoss, 3.

¹² Sec. F.

¹³ See Stephen Pavelin and Lynda A. Porter, "Race-to-the-Bottom or -Top at Home or Abroad: Health and Safety Standards and the Multinational Firm," *The Economic and Social Review*, Vol. 42, No. 3, 2011; Sara Hinkley, Annette Bernardt, and Sarah Thomason, "Race to the Bottom: How Low-Road Subcontracting Affects Working Conditions in California's Property Services Industry," Publication of the *University of California Berkeley Labor Center*, 2016; Jason R. Bent, "Compensability, Opportunism, and the Race to the Bottom: A View from the (Near) Bottom," *American Bar Association's Journal of Law & Labor Enforcement*, No. 2, 2023.

not only expose H-2A workers to reduced safety enforcement standards, but also jeopardize workplace safety standards for the entire range of non-H-2A, American agricultural workers. As such, Hispanic Federation strongly the Department's proposed reversion of this section on the grounds that it will jeopardize the health and safety of both H-2A and non-H-2A workers, as well as those of research burdens it would impose upon employing firms.

Similar considerations inform Hispanic Federation's opposition to the proposed rescinding of proactive housing standard compliance and access to health-care providers. H-2A workers are consistently employed in jobs that record some of the highest rates of workplace injuries among any in the U.S. labor force.¹⁴ Meanwhile, H-2A workers are routinely subjected to dangerous housing conditions that defy the Department of Health and Human Service's definition of adequate, in flagrant violation of H-2A programmatic requirements.¹⁵ Substandard housing is not only a statutory violation, but a health risk, that jeopardizes the wellbeing of workers and the productivity of H-2A employing job sites.¹⁶ Guaranteeing worker access to meetings with healthcare professionals and access to adequate housing in compliance with statutory obligations will in turn augment working conditions for non-H2A workers, according to the obverse of the mechanics discussed above. Simultaneously, as with seatbelts, the Department has also failed to provide evidence that the underlying violations and safety conditions which supported those regulations have been resolved. As such, the Department offers little basis for rescinding rules passed through normal comment-and-review process that were grounded upon public safety improvements. Until the Department demonstrates that the underlying workplace safety conditions have been resolved, these rules cannot be deemed superfluous. Consequently, Hispanic Federation opposes their rescission.

6. Opposition to Rescission of Employer Registering; Proposal for Revising Reporting, Not Rescinding Rule

The Department proposes rescinding rules requiring that H-2A employers document and report critical organizational information, including the name and address of formal employers, as well as legitimate interlocutors like H-2A recruitment specialists. The Department argues that the current rule imposes "significant burdens," and therefore should be rescinded. Hispanic Federation strongly argues against rescinding this rule on the basis that imagined barriers are likely overestimated owing to the nature of most H-2A employers, that rescinding the rule would jeopardize American border security, and that the Department's proposal will undermine the agricultural labor supply while increasing costs upon American taxpayers.

¹⁴ <https://www.cepr.net/latino-immigrants-do-many-of-the-most-dangerous-jobs/> (Accessed 5/2/25)
<https://www.bls.gov/opub/ted/2023/work-related-fatal-injuries-among-foreign-born-hispanic-or-latino-workers-rose-to-727-in-2021.htm> (Accessed 5/2/25)

¹⁵ Bryce W. Ashby, "Indentured Guests - How the H-2A and H-2B Temporary Guest Worker Programs Create the Conditions for Indentured Servitude and Why Upfront Reimbursement for Guest Workers' Transportation, Visa, and Recruitment Costs Is the Solution," *University of Memphis Law Review*, Vol. 38, No. 4, 2007.

¹⁶ U.S. Census Bureau, 2019, quoted in Samantha Friedman et al., "Hispanic Disaster Preparedness in the United States, 2017: Examining the Association with Residential Characteristics," *Cityscape*, Vol. 23, Issue 3. 2021. 205-239.1.

The Department's assertion that rules requiring effective documentation of recruiters and other interlocutors as well as advertising geographic information about prospective H-2A employment are burdensome is spurious when considered in conjunction with the virtual monopsony among H-2A employers. Scholarly research confirms that the vast majority of H-2A workers are employed under large firms which routinely hire under the H-2A program.¹⁷ Such employers are possessed of both the resources and the technical knowhow to document and relay the requisite information – much of which they likely already have in internal human resources systems according to current standards of best practice.¹⁸ Consequently, it is reasonable to believe that these large employers could effectively provide documentation required under the rule, particularly were the Department to provide them with effective training resources to convert internal data like contracts and payment records into documentation meeting the requirements of the rule. In turn, HF strongly encourages the Department to collaborate with H-2A employers to draft training tools to facilitate smooth compliance with these reporting requirements.

Not only does the rule in question seem unlikely to qualify as excessively burdensome for any employer already operating according to industry best practices, but these reporting requirements also play an essential role in ensuring the H-2A program is not exploited by nefarious actors. There is a regrettable history of grifters and traffickers masquerading as international H-2A recruiters, and even a possibility that recruiters themselves have acted in ways that undermine the intentions of the H-2A program.¹⁹ Thus, maintaining the current rule is beneficial to both preserving international order and supporting current U.S. foreign policy objectives. Additionally, the rule supports more effective access to labor markets by H-2A providers by empowering prospective H-2A employees to interact exclusively with legitimate recruiters. Indeed, the Department recognizes that prospective H-2A workers stand to benefit from these increased reporting and verification requirements. However, the Department fails to consider that H-2A employers also benefit, as illegitimate recruiters remove prospective workers from the H-2A labor pool, in turn depriving H-2A employers of potential workers. In turn, rescinding the rule would drive up labor costs for the agricultural sector, and risk increasing grocery prices for working American families, solely to enrich illegitimate actors. As such, eliminating regulations against illicit faux-recruiters is proposal mutually deleterious to both H-2a workers and American agricultural employers, and should be withdrawn.

Finally, the proposal would also deprive the Department of essential investigatory resources. As noted above and in research, the H-2A program is plagued with potential workplace standards violations that necessitate routine oversight and intervention by the Department.²⁰ The reporting requirements under the rule reduce the investigatory burden placed upon federal oversight officials. In turn, the rule decreases costs imposed upon American taxpayers to investigate

¹⁷ See: Gibbons et al. (2019), and Holtkamp and Orazem (2024.)

¹⁸ See <https://www.phelps.com/insights/you-say-employee-i-say-independent-contractor-12-best-practices-for-avoiding-worker-misclassification-suits-in-the-gig-economy.html> (Accessed 8/7/25,) Glynne Williams, Steve Davies, and Crispen Chinguno, "Subcontracting and Labour Standards: Reassessing the Potential of International Framework Agreements."

¹⁹ Jennifer Gordon, "Global Labour Recruitment in a Supply Chain Context," publication of the International Labour Organization, 2015.

²⁰ Again, Ashby (2007), Gordon (2015), and Cheng (2025) are instructive to this point.

unscrupulous or noncompliant employers. Subsequently, the Department's proposal would increase both fiscal and administrative costs for taxpayers. H-2A employers already benefit from a program allowing them to employ a broader-base of workers than other U.S. employers do; it is only sensible that these employers should be required to shoulder the burden for any investigations into programmatic noncompliance or malfeasance by proactively providing information relevant to federal oversight work. For that reason as well as those stated above, the rule should be maintained but clarified through supplemental training materials to facilitate easy of reporting compliance for H-2A employers.

7. Opposition to Removal of Definitions for Just Cause for Firing

The Department proposes rescinding current definitions for circumstances that constitute just cause for termination of H-2A employment. Hispanic Federation contends that the current definition is reasonable in scope, and that the codification of a definition for just cause dismissals is essential for safeguarding both employer and employee rights against wrongful termination and/or spurious litigation alleging wrongful termination. In turn, the presence of this regulation reduces bureaucratic guesswork by H-2A employers, thereby freeing work hours that would otherwise be employed for administrative interpretation. Consequently, Hispanic Federation urges against rescinding these definitions. Instead, Hispanic Federation suggests the Department examine providing greater clarification in the current rule on contexts that qualify as just cause.

8. Opposition to Rescission or Revision of Housing-Related Provisions

Hispanic Federation strongly opposes the Department's proposals to revise §655.145(b) and §653.501(c) to remove introduced regulations over the intersections of H-2A contract start dates and provided housing, as well as the proposed rescission of §655.132(e)(1) governing proactive compliance with housing standards, among other proposals by the Department that alter regulatory oversight for and obligations under short-term delays to the commencement of H-2A contracts. The proposed changes will jeopardize workforce safety and productivity, undermine trust in the H-2A system, and increase costs imposed onto taxpayers by compliance investigations.

H-2A employers are, of course, legally required to provide adequate and effective housing to all H-2A employees, as well as commensurate accommodations to non-H2A workers engaged under similar terms.²¹ The necessity of this provision is both apparent and well-established; as H-2A workers migrate from outside the United States to worksites, and therefore lack the requisite means, information, access, and in many cases legal opportunity to obtain short-term housing on their own for the duration of their H-2A contracts. As such, they are reliant upon housing provided to them by employers. In turn, H-2A workers and non-H2A workers can be severely inconvenienced to the point of jeopardizing health by failure to provide owed housing.²² Agricultural conditions are flexible and often unpredictable; it is therefore sensible that the Department offers flexibility to H-2A contract providers in start date. However,

²¹ <https://www.dol.gov/agencies/whd/fact-sheets/26g-housing-standards-for-rental-and-public-accommodations-H-2A> (Accessed 8/8/25.)

²² Ashby (2007), Cheng (2025.)

when workers commence travel to H-2A job sites, they organize their itineraries such that they arrive at the intended start date of work. Current requirements that employers provide housing for H-2A employees from the initially-contracted start date, rather than the inception of work in the event of minor delays are sensible in light of these challenges.

The Department however proposes eliminating provisions that provided compensation and accommodations for a period of 14 days when employees are informed of work start alterations with less than 10-days' notice, as well as those outlining those requirements more specifically within the regulatory language directly tied to the H-2A program. These proposals risk exposing H-2A and concomitant non-H-2A workers to exploitative conditions and even short bouts of homelessness if implemented. In turn, the proposals not only fail to adhere to the INA's requirement that H-2A contracts not jeopardize working conditions for non-H2A workers, but also risk facilitating employer violations of the Fair Labor Standards Act (FLSA). Likewise, the ensuing dearth of housing would undermine employee health, risking decreases in economic productivity, harming both employers and American consumers.²³ Simultaneously, these proposals would increase costs to H-2A employers by requiring them to parse multiple regions of federal code to ascertain compliance, versus having access to all relevant, governing requirements within H-2A governing language. Thus, while elements of housing and workplace protection guarantees are arguably duplicative, they should nonetheless be maintained to reduce administrative costs, according to the Department's own considerations elsewhere. Finally, proposals to reduce proactive assurance of compliance with housing guarantees will not only provide increased avenues for well-meaning employers to unintentionally find themselves in violation of housing rules after the fact, but also increase costs and times for investigations into negligent employers, thereby raising costs for taxpayers. For all of these reasons, the housing-related provisions identified by the Department for rescission or revision should instead be maintained.

9. Opposition to Rescinding the Rules Protecting Protected Socializing Activity

The Department proposes rescinding guidance guaranteeing access by certain guests to H-2A worker housing provided by H-2A employers. However, rescinding this rule would jeopardize the rights of both H-2A and non-H-2A workers. The Department cites *Barton* in reasoning that guaranteeing associational access to employer-furnished housing would represent a burdensome requirement that employers extend housing not just to employees, but others as well. However, this interpretation draws a spurious comparison between the housing and access opportunities afforded (and not afforded) to non-H2A workers and those to H-2A workers – the vast majority of whom are entirely reliant upon employer-furnished housing. Consequently, revoking socialization and association access protections from these workers would risk depriving them of *all* reasonable access, not merely under specific circumstances, as employers would henceforth control both workplace and domicile association. The increased limitations to freedom of movement (in both literal and sectoral terms) faced by H-2A workers warrant greater consideration of their needs and rights under both the FLSA and the National Labor Relations Act (NLRA.)

²³ Myde Boles, Barbara Pelletier, Wendy Lynch, "The Relationships Between Health Risks and Work Productivity," *Journal of Occupational and Environmental Medicine*, Vol. 46, No. 7, 2004.

The Department invites proposals for alternatives that balance essential workers' rights and property considerations by H-2A employers. Hispanic Federation principally recommends maintaining the current rules. Alternatively, we strongly advise that the Department commence negotiated rulemaking on this point, convening major H-2A employers, workers' associations, labor organizations, and community-based nonprofit groups to consider other recourse, including contractual agreements requiring temporal access windows or guaranteed transportation for individuals and groups to third-party locations. It is essential, however, that the Department convene diverse stakeholders in devising any new proposals on housing and social access.

10. Opposition to Rescinding Worker Voice Empowerment Provisions as well as Rule Barring Pre-Final Determination Hearings

Hispanic Federation opposes the Departments' proposal to rescind provisions related to workers' voice empowerment, as well as those barring pre-final determination hearings. These proposals risk muddying employers' understanding of their obligations to workers under the NLRA and the FLSA. Indeed, particularly in light of the unique protections obligated to H-2A workers under the confluence of labor law with the INA, the clarifications offered by current rules are essential. Furthermore, as written, the Department's proposals leave unclear whether revisions would overstep state's rights to establish complementary law regarding workplace arbitration and determination hearings. In turn, it is unclear that the Department possesses statutory authority to preempt such state-level protections under the present rulemaking authority. Consequently, we urge the Department to withdraw these proposals, and instead resubmit them for public review with requisite statutory clarification.

11. Methodological Concerns

Some of the Department's quantitative assessments as well as inconsistent deference to court rulings suggest that the proposed changes were not subjected to sufficiently rigorous consideration to meet rulemaking requirements, including those requiring quantitative assessment of impacts to small entities. For instance, the Department's consideration of cost-savings is apparently rooted in simple percentile calculations, without considering alterations in economic growth, productivity, labor access, or long-term administrative savings.²⁴ Concerningly, typographic errors like those in Sec. 3(a)(i) obscure the actual basis upon which the Department is drawing determinations regarding both small entities and larger economic impacts. Similarly, while the Department is quick to defer to cases like *Barton*, yet largely ignores the implications of *Torres Hernandez v. Su*. The Department's justifications for deferring to district court rulings in regions with fewer H-2A employers and workers over appellate rulings from the Ninth Circuit (which oversees a tremendous proportion of H-2A workers across multiple sectors) lacks transparency. Consequently, Hispanic Federation urges the Department to withdraw and resubmit proposals with greater methodological clarity.

12. Support for Retaining Employer and Overtime Definitions

²⁴ Castillo (2022) and Rutledge (2025) both offer more robust quantitative modelling that could serve as alternatives for future rulemaking.

The Department proposes retaining several definitions and tests from current rules, including those for single employers and clarifying requirements for advertising overtime pay opportunities and rates. The Department outlines these proposals in Sec. I, including retaining language in §655.122(l)(4), §655.210(g), §655.103(e), §651.10, §655.181, §655.182, and 29 CFR §501.3(d) and §501.20. Hispanic Federation supports these proposals as beneficial to both employers who will reap rewards from greater programmatic clarity and non-H2A workers who will benefit from expanded access to information about overtime availability, in addition to more direct benefits to H-2A workers.

13. Hispanic Federation Serving Relevant Initiatives

Hispanic Federation and its network have been serving economic development and agricultural workforce programs decades through programs coordinating training, direct aid, safety advocacy, and culturally and linguistically competent support upon arrival. As an umbrella organization, Hispanic Federation has a proven track record of designing and launching national, state-wide, and locally focused initiatives, that directly support H-2A workers and facilitate their effective employment within the program. Programs include:

- *Farm and Food Workers Relief Program:* In 2022, HF kickstarted the FFWR program that provides one-time relief payments of \$600 to 62,900 qualifying farmworkers and meatpacking workers thanks to a two-year, \$44.3 million grant administered by the U.S. Department of Agriculture's Agricultural Marketing Service. Workers who incurred pandemic-related health and safety costs in 19 states, Puerto Rico and the U.S. Virgin Islands are eligible for rewards through the grant.
- *Florida's HELLO Program:* Through Florida's HELLO (Help, Education, Legal Assistance, Listening, Outreach) program, HF conducts monthly workshops with the Orlando Center For Justice to provide immigrant community members, including newly arrived migrants, with culturally and linguistically competent information about the immigration system in America. This includes free legal guidance with trained lawyers and staff to help participants navigate this immigration system. HF's experience serving the immigrant community in Florida is particularly relevant to our assessment of the proposed maritime expansion of the Circumvention of Legal Pathways rule.

14. Conclusion

The Department has proposed a sweeping series of regulatory revisions, some of which would benefit workers, employers, and taxpayers alike, while others would stand to complicate the regulatory landscape, reduce economic output, and jeopardize compliance with broader statutory requirements. Hispanic Federation urges the Department to more broadly consider local and sectoral economic effects from the proposals at hand. Many would risk trading long-term benefits in productivity and support for American workers in exchange for short-term gains. In

turn, we exhort the Department to consider a broader base of qualitative and quantitative data and research to inform decisions that will shape not only working conditions for all Americans, but also the viability of our nation's domestic food supply.

Sincerely,

Julietta Lopez

Julietta Lopez
Vice President for Federal Advocacy and Network Mobilization
Hispanic Federation

cc.

Keith E. Sonderling, Deputy Secretary, Department of Labor
Lori Chavez-DeRemer, Secretary, Department of Labor
The Honorable Mike Johnson, Speaker of the United States House of Representatives,
U.S. House of Representatives
The Honorable Hakeem Jeffries, Minority Leader, U.S. House of Representatives
The Honorable John Thune, Majority Leader, United States Senate
The Honorable Charles Schumer, Minority Leader, United States Senate
The Honorable Markwayne Mullin, Chair, Subcommittee for Employment and
Workplace Safety, Committee on Health, Education, Labor, and Pensions, US Senate
The Honorable John Hickenlooper, Ranking Member, Subcommittee for Employment
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