**WorkforceGPS**

**Transcript of Webinar**

**National Farmworker Jobs Program (NFJP) Program Year 2021 Formula Allocation Discussion**

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*Transcript by*

*Noble Transcription Services*

*Menifee, CA*

GRACE MCCALL: And welcome to an NFJP Payment Year 2021 Allocation Formula Discussion. So without further ado, I'd like to turn things over to our moderator for today, Thoa Hoang. Take it away, Thoa.

THOA HOANG: Thank you, Grace. Thank you, again, for taking the time to join our discussion today. If you haven't done so already, please share where you are joining us from or where you would like to be dialing in from.

My name, again, is Thoa Hoang, and I'm a workforce analyst in the Office of Workforce Investment, Specialty National Programs Unit. I'm joined by my colleague David Litvin, who is a budget analyst in the Budget Office, and Daniel Carroll, who is a program analyst in the Division of Research and Evaluation, Office of Policy Development and Research.

Today, we will share the preliminary state planning allotment. This is a complex formula. So if we can't get to your questions or if they require further research, we will reach out via email. If you have comments specifically to the formula and the modification, then the best way to provide your feedback is through the public comment process.

Today's objectives. The structure of this presentation will be similar to how information is laid out in the Federal Register Notice. So the webinar is meant to highlight key aspects of the Federal Register Notice and discuss the modifications that you will see in the notice when it is published. I will also explain how you can provide ETA your feedback.

Next, I'll discuss the two modifications that ETA has incorporated into the formula, and then David and Daniel -- so Daniel will walk us through the data. And, finally, David will explain the hold harmless provision and the minimum funding provision. Our presentation will end with a discussion session, which is where we can provide any answers to your questions.

The purpose of this slide is to provide you the citations for previous Federal Register Notices that are helpful to review to get a better understanding of the formula and previous modification. The 1999 notice would be the best resource, if you want to look at the methodology used to calculate the planning -- the state planning allotments.

In program year 2018 ETA incorporated two modifications into the formula. These modifications have been incorporated into our calculation for PY '21.

With the '21 notice, ETA will provide preliminary planning estimates for program year 2021 to state service areas awarded grants through the Funding Opportunity Announcement, FOA ETA 20-08 for the NFJP Career Services and Training Grants and housing grants.

The estimates are based on the funds appropriated in the Consolidated Appropriation Act of 2021, Public Law 116-260. From this point forward, we will refer to this as the Act.

The notice will outline the two modifications to the allotment formula, which I will go over in the subsequent slides. But, first, the public comment process.

The Federal Register Notice represents the first of two -- the first of a two-stage process. In the first stage, the public will have 10 business days after the publication to submit written comments. Comments are accepted via email to NFJP@dol.gov. Please enter PY '21 National Farmworker Jobs Program Grantee Allotments Public Comment in the subject line of your email. Upon receiving public comments regarding the notice, ETA will consider the comments.

In the second stage, the final formula and the final allotment levels will be published also in a Federal Register Notice. And ETA will also release a Training and Employment Guidance Letter. Should you have any questions on this notice, you can submit them to the NFJP mailbox also at NFJP@dol.gov.

ETA developed the allotment formula to distribute funds geographically by state service area based on each state's service area's relative share of persons eligible for the NFJP. So on the slide, you will see the amount Congress has provided for program year 2021. The formula approximates the distribution of farm workers within the United States who meet the NFJP eligibility criteria and account for the following three points.

So, first, the identification of NFJP eligible farmworkers. Second, the time and location of their activities, including the amount of time doing farm work, non-farm work, and time not employed. And, third, relative differences across regions in the length of time eligible workers are engaged annually in crop employment and other eligibility activities.

Let's talk about some of the modifications. So in the next couple slides, I'll talk about the modifications that ETA has made in the formula. Then I'll hand this over to Daniel to talk about the data updates.

So the two small modifications to the formula are, one, ETA included farmworker who are in families with total family income at or below 150 percent of the poverty line. Second, ETA considers a crop worker to be primarily employed in agriculture if at least 50 percent of their total individual income is from farm work or at least 50 percent of their total employment time is in farm work.

OK. Modification one. Previously, the definition of low-income individual in WIOA Section 336(a)(2) was based on whether the individual was in a family with a total family income that did not exceed the higher of the poverty line or 70 percent of the lower living standard income level.

The PY '21 appropriation changed this eligibility to include farmworkers who are in families with total family incomes at or below 150 percent of the poverty line. This eligibility is tied to the appropriation language for program year 2021 and applies to the grant activities funded under the PY 2021 awards.

So to calculate for this modification, the PY '21 allocation uses a special tabulation of data from the American Community Survey, the ACS, and the National Agricultural Worker Survey, the NAWS, to estimate the share of livestock and crop workers in each state with total family incomes at or below 150 percent of the poverty line, respectively.

ETA will subsequently revise the by 2022 guidance regarding the definition of low-income individuals as needed, if the same provision is not included in the subsequent appropriation. So, in short, the first modification took place as required by the FY 2021 appropriation.

Modification two. ETA updated how the formula accounts for crop workers who are primarily employed in agriculture, specifically through including formula factors that account for time in agriculture rather than just income earned in agriculture. This modification aligns the formula more closely with that definition of eligible migrant and seasonal farmworker under WIOA Section 167(i) and 20 CFR 685.110 and clarifies -- and is clarified in the Training and Employment Guidance Letter 18-60.

Previously, for the formula, a crop worker was considered to be primarily employed in agriculture if, one, at least 50 percent of their total individual income was from farm work, and, two, if they worked at least 25 days or earn at least $800 in crop work in the previous 24 months.

This change would consider a crop worker to be primarily employed in agriculture if at least 50 percent of their total individual income is from farm work or if at least 50 percent of their total employment time is in farm work. And as with all state planning estimates since 1999, ETA will use NAWS data to determine the share of crop labor hours in each state that was performed by crop workers who were primarily employed in agriculture, per the eligibility criteria.

So this only applies to estimates of NFJP eligible labor hours performed by crop workers because the data that would be needed to similarly estimate NFJP eligible labor hours performed by animal, agriculture, or livestock workers are not available.

And as with previous allocations of NFJP grant funds, updating the data sources used in the formula and modifying the NFJP eligibility criteria will result in changes in each state's relative share of funding. Therefore, ETA mitigates large changes in state allotments by using the stop loss/stop gain provision, which will be discussed by Daniel later in the presentation.

So with that, I'm going to pass this over to Daniel.

DANIEL CARROLL: Thank you, Thoa. And good afternoon, everyone. It's my pleasure to be with you today to talk about the NFJP formula. I'm going to talk just briefly about the data sources that inform the allocation formula through the entire history of the formula for data sources have been used, and we're using those same data sources this time.

We start off with hired labor expenditure data from the Census of Agriculture. That's the -- really the -- everything is anchored in those data. Specifically, we're getting the amount of money that employers paid their workers for the 2017 census -- 2017 census this year. And then we're using a wage rate from the USDA's Farm Labor Survey to convert those dollars into hours.

We're also using regional level demographic data from the ETA NAWS to figure out the share of crop workers in each region that are NFJP eligible, and we're using ACS data from the 2015-2019 five-year file to figure out the share of livestock workers that meet the income eligibility or who have family incomes that are at or below 150 percent of poverty.

And we also use ACS data to determine the same eligibility rates for crop workers in Hawaii, Alaska, and Puerto Rico, because we don't have NAWS data on farmworker characteristics for those locations.

So, again, what this formula does, there isn't a census of farmworkers. So there's no one data source that can tell us how many farmworkers there are and how they're distributed across the United States. There is a Census of Agriculture, and it does provide state-level counts of farmworkers. But there are a number of problems with those counts.

So back in 1999, it was determined that the best way to start off with figuring out the number and distribution of farmworkers was to use hired labor expenditure data. And we get that from the Census of Ag. The Census of Agriculture is administered every five years. So this time around we're using data from 2017. And, again, what we're doing is we're converting those dollars into hours of farm labor by dividing expenditures by a wage.

So if you see -- look at the bottom of the slide, it's just easy math. We're dividing. We're taking dollars and dividing them to -- dividing those dollars by dollars per hour and we get hours. And so we're using the USDA's Farm Labor Survey for wage rates.

I just want to note here that we'll be talking a lot or we already have been talking about hours of labor, adjustment three to the formula, NAWS adjustment three, not one of the modifications that we're talking about this time, but the normal NAWS adjustment three to the formula converts dollars into a people denominated index. So at the end of this formula, hours are converted into people. Just FYI.

OK. And so we're using the NAWS data to look at the characteristics of crop workers. The NAWS is administered three times per year, and it has the data that allows us to identify crop workers who are NFJP eligible based on three eligibility criteria. And those are at least -- that the crop worker is primarily employed in agriculture, that at least 50 percent of the farmworker's individual income is from agriculture, and the farmworker is authorized to work in the United States. I'm sorry, the income criteria is family income is at or below 150 percent of poverty.

And so, again, we apply these eligibility criteria to hours of work to estimate the number of hours worked in each state by NFJP eligible crop workers. We can't do all of this for livestock workers because we don't have the same data for livestock workers.

And then adjustment two accounts for time and location of activity, and adjustment three accounts for turnover rates. I'm not going to talk about adjustment two and adjustment three today. They are important adjustments, but we're just not going to get into those today.

And then lastly, we're using the American Community Survey data, which is -- that survey is administered monthly. We're using it to figure out the share of hours worked by livestock workers that are NFJP eligible. And we're also using ACS data to figure out the share of crop labor hours worked in Hawaii, Alaska, and Puerto Rico that are NFJP eligible. And what we're looking at specifically is the share of farmworkers in those areas that have family income that is at or below 150 percent of poverty.

So all of this might seem a little complicated, and if you read the 1999 Federal Register Notice many, many times, you still might have questions. But it works, and it makes sense after you think about it.

There's one census and three surveys that collectively determine each state's service area's share of persons eligible for the NFJP. But it really boils down to a state's share of farm labor expenditures and hours and the characteristics of farmworkers that determine a state's share of the allocation.

I did a real quick statistical analysis and just looked at the relationship between labor expenditures and the share of the allocation. And the relationship is positive, meaning that, if the share of labor expenditures increases, the share of the allocation increases. And that relationship is even stronger if you look at the share of farm labor hours in relation to the share of an allocation.

So, I mean, the program office might not be happy for me to say this, but an NFJP grantee could really get a good sense of what their allocation is going to be if they just looked at a special tabulation of Census of Ag data and calculated their state's share of labor expenditures. It will line up pretty closely with the share of the allocation.

So in between formula updates, the main drivers or determinants of a state's share of the allocation are changes in a state's share of labor expenditures and hours of labor and also changes in regional characteristics of farmworkers.

So this slide is showing within region changes in the NFJP eligibility rates for crop workers between PY '18 and PY 2021. What we're looking at is just the share of crop workers in each region that are NFJP eligible based on the three eligibility criteria. We're not looking at shares of the allocation. We're just looking at the share of crop workers in a region that are NFJP eligible.

I think this is a useful slide because it will tell you how characteristics changed in your state or region between 2018 and 2021 in relation to changes for the United States as a whole and to other regions.

Now, we did look at the impact of modifying the primarily employed in agriculture eligibility criterion, as Thoa explained. Before, you had to satisfy working a certain number of days in agriculture and meeting the income criteria, which was at least 50 percent of your income was from agriculture.

Now, farmworkers can be primarily employed in agriculture by satisfying either one of those. So it's an either/or situation. And that change increased the share of crop workers who are NFJP eligible in every region, especially in 4 of the 12 regions, the Northeast 1, Mountain 1 and 2, Corn Belt Northern Plains, and the Lake Region. And these regions, what makes them stand out is they have shorter growing seasons compared to the other regions.

So, essentially, what happened is in these regions, in the northeast and the north, crop workers who before did not meet primarily employed in agriculture because less than 50 percent of their income was from farm work, they are now eligible because at least 50 percent of their time employed is in agriculture.

So what is happening is that they have two ways to meet this criterion. And it looks like workers in these regions, a lot of them have short stints in non-farm jobs where they make most of their money while they work at least 50 percent of their time in agriculture, if that makes sense.

And here's the state -- if you're not familiar, a map of the states by region, if you're not familiar with your region.

So, now, I'm going to talk about the states where there is an increase and a decrease in the formula derived shares, and here when I say formula derived, I mean without any stop loss or stop gain.

So in this slide, we're looking at 10 states that had the largest percentage decrease between 2008 -- I'm sorry -- program year 2018 and program year 2021 in the share of farmworkers who are NFJP eligible. And you can see that the changes are pretty small and the percent difference is you have to go up to six decimal places to see any difference between these states.

And, again, here we're looking at all three eligibility criteria, and 95 percent of the time when we're looking at these states, the thing that explains the decrease is either the state's share of farm labor hours decreased or they're in a region where the NFJP eligibility rate increased but at a rate less than the national average, if you can wrap your minds around that.

So, I mean, the formula is working. And, again, it's really just farm labor -- the share of farm labor hours and farmworker characteristics that are primarily determining a state's share of the eligible population and, hence, a state's share of the allocation.

This slide shows us the top 10 states that had an increase. Here the increases are a little bit bigger than the decreases. And, again, we are looking at changes between PY '18 and PY '21 that would be based only on the formula without any stop loss or stop gain. So the percentages that we're looking at here are not a share of the allocation.

And I think it's now time for me to turn this over to David.

DAVID LITVIN: OK. Thank you, Daniel, and hi, everyone. First, I'm going to talk about the hold harmless provision, and to mitigate large changes in state allotments, ETA uses of the stop loss/stop gain, or hold harmless provision. ETA will implement the hold harmless provision as instituted in PY '18.

In PY '21, each state's service area will receive an amount equal to at least 95 percent of their PY '20 allotment percentage, as applied to the PY '21 formula funds available. The stop loss percentage is lowered in the following years.

The PY '21, '22, and '23, the stop gain provision provides that no state's service area will receive an amount that is more than 150 percent of their previous year's allotment percentage.

Using the stop loss and stop gain ensures allotment levels gradually approach states' formula driven amount over time rather than immediately in a single year. Each year, the stop loss percentage is lowered the allotments get closer to the formula driven amount. When several states hit the stop loss, funding is added to those states to get them up to their stop loss level. This can result in lowering other states' allotments since there is a limited amount of funding available to distribute among all states.

If a state's formula driven amount and the state allotment table is higher than the amount it's receiving with the stop loss applied, the reason that happens is caused by other states having their stop loss.

This slide is a small excerpt from the 1999 Federal Register Notice that shows the gradual stop loss implementation that was used in PY 1999. The purpose of this slide is to show that this gradual implementation was used in the past. So this method is not a new concept.

This approach set the precedent for the PY '18 and PY '21 allotments in our next slide. The updated data resulted in significant changes for a few states, and the hold harmless provision provides for a stop loss/stop gain limit in order to transition to the use of updated data. The formula's original methodology is described in the Federal Register Notice from May 19th, 1999.

This slide is meant to provide a quick summary of the hold harmless implementation that ETA has done so far and our plan for the future. In PY '18 we used updated data and used the same stop loss/stop gain gradual implementation approach from the 1999 Federal Register Notice.

In PY '18, we used the 95 percent stop loss and gradually lowered it each year. In PY '21, we used updated data and started this process over again. For all years, a 150 percent stop gain was used. In PY '24, ETA plans to updated data, pending its availability.

At that time, the department will determine whether changes to state allotments are significant enough to warrant another hold harmless provision. Otherwise, allotments to each state's service area will be for an amount resulting from a direct allotment of the funding formula without adjustment. PY '20 and PY '24 represent years that are the start of a new four-year grant period.

Next, I'm going to move on to NFJP funding.

A state area that would receive less than $60,000 by application of the formula will, at the option of DOL, receive no allotment or, if practical, be combined with another adjacent state area. Funding below $60,000 is deemed insufficient for sustaining an independently administered program. However, if practical, a state jurisdiction that would receive less than $60,000 may be combined with another adjacent state area.

This slide describes the preliminary allotment table and the next slide, but I'm actually going to go through this with the table showing but we have it here for your future reference.

For PY '21, the funding level provided for in the Act for the Migrant and Seasonal Farmworker Program is $93,896,000, of which $87,083,000 was appropriated for training grants.

After $137,000 was set aside for program integrity, the department will allot $86,946,000 for training grants based on the formula and data outlined in this notice. The figures on the first numerical column show the actual PY '20 formula allotments to state service areas. The next column shows the percentage of each allotment.

Columns three and four show the state service area allotments with the application in the first year, 95 percent, hold harmless and minimum funding provisions followed by the percentages. The difference between PY '21 and PY '20 allotments is shown in column five.

Column six of this table shows the allotments based on the proposed formula without the application of the hold harmless or minimum funding provisions. The percentages are reported in column seven.

In general, increases or decreases in a state's funding are due to the updated data, the use of the hold harmless, and changes in appropriation levels.

I mentioned this on the hold harmless slide, but I'm actually going to mention it again because we've gotten questions on this in the past. When dealing with this table, if a state's formula driven amount is higher than the amount it's receiving with the stop loss applied, the reason that happens is caused by other states hitting their stop loss.

Now, I'm going to turn this back over to Thoa. Thank you.

MS. HOANG: Great. Thank you so much. The questions are rolling in. So I'm going to -- so we can start responding to those questions, and if you have more, you can type them in the chat box.

So, first, I'll just answer, "Does this mean that animal agriculture workers are not eligible for help?"

That's not true. Animal agriculture or livestock workers are eligible for NFJP.

And the second question, "Would you please further discuss modification two with regard to farmworker who work with animals?" And, Daniel, I'm going to pass this to you.

MR. CARROLL: So thank you, Thoa.

Yeah. Modification two is changing the eligibility criterion primarily employed in agriculture. The data -- or to meet that criterion, a farmworker can satisfy one of two things, either 50 percent of his or her income is from farm work or at least 50 percent of the farmworker's employment time is in agriculture.

We don't have those data for animal agricultural workers. So we're unable to apply that modified criterion to animal agricultural workers, but it doesn't exclude animal agricultural workers from qualifying for the NFJP. I hope that makes sense.

STEVE RIETZKE: And, Daniel, this is Steve. Can I jump in and offer a clarification and you can tell me if I'm -- oh, sorry. Can you --

MS. HOANG: Yes.

MR. RIETZKE: Sorry. This is Steve. Can you hear me okay?

MS. HOANG: Yes. Go ahead.

MR. RIETZKE: I was going to just jump in and add to what Daniel said. And, Daniel, correct me if I'm wrong, but the gist of that modification to the formula, it's not a change to the program's eligibility criteria. It's a change to the way that we're calculating the proxy for that eligibility criteria.

And so what Daniel's describing is the way we're looking at the data as our best estimate for the true eligible population in a state. And so it's not impacting the actual eligibility of participants. It's impacting the way we're calculating our estimate. I just wanted to offer that clarification in case that was -- in case anybody was scratching their heads.

MS. HOANG: Thank you. Yes. That's a great addition. I think that should answer -- okay -- the first two. We'll move on to the raw statistical data. "Is this available anywhere?" Daniel, I'll refer this back to you.

MR. CARROLL: OK. Thanks, Thoa. Yeah. We have lots of raw data, and maybe offline or somehow the program office could figure out what kind of data would best help the grantees. I mean, I can provide spreadsheets that show each state's share of labor expenditures and hours and regional NFJP eligibility rates, if that would help. But I think as a first step, it would be good to figure out what information would be most useful to the grantees, and then we can pull that together.

MS. HOANG: Great. Thank you. And then regarding the next question, "Please define crop worker versus farmworker."

So I can define the farmworker part of that question. So for this, I would point to our regulation, where we defined a eligible migrant and seasonal farmworker. They -- means an eligible migrant farmworker or eligible seasonal farmworker also refers to in our -- oh, this is defined in WIOA Section 167, and I can quickly pull that up and include that as a response as well.

MR. CARROLL: Thoa, I would just add, similar to Steve's clarification on the last question, for the purposes of the formula, we're using data that distinguishes between crop workers and -- crop farmworkers and animal agricultural workers. Collectively, they are the population farmworkers.

We have lots of data on crop workers because of the NAWS, and we have some data on livestock workers because of the ACS, the Census of Ag and the USDA Farm Labor Survey.

The population of all farmworkers turns out to be mostly crop workers. About 80 percent are crop workers, and 20 percent are livestock. And the way we distinguish the two is we're looking at expenditures by North American Industrial Classification System NAICS. So crop workers are farmworkers who are employed by employers and NAICS 111 crop production, NAICS 1151, which is support services for crop. And, clearly, animal agricultural workers are employed --

MS. HOANG: Daniel, you dropped off a little bit, so if you want to repeat what you just shared.

MR. CARROLL: Yeah. Sure. I'm not sure where I dropped off, but, essentially, crop workers are about 80 percent of the farmworker population, and we are estimating the number and the share of crap workers based on farm labor expenditures from the Census of AG, which are reported by NAICS Code North American Industrial Classification System.

So crop workers are employed by employers in NAICS 111, which is crop production and NAICS 1151, support services for crop production. And animal agricultural workers are employed by employers in NAICS 112 and 1152.

That doesn't mean that an employer who has a NAICS 112 code, animal agriculture, does -- can't have crop workers as well, but I hope that answers the question. Crop workers are a subset of farmworkers.

MS. HOANG: Yes. Thank you. No. That's a better explanation than I provided.

All right. Let's -- what does ETA -- oh, "When does ETA expect to publish the PY '21 allocation table?" I'm going to pass this to Steve.

MR. RIETZKE: Sure. So this is kind of an unofficial answer, but a little birdie told me it should be the -- and I typed this in the chat too. My understanding is that our Federal Register Notice should be on public inspection hopefully this Friday and then officially published on Monday.

So we had hoped to have it up by today, and there's a lot of steps involved. So we didn't quite get it out, but we wanted to at least explain the content of it to you all so you kind of have more context when you actually look at it. So that's the -- the short answer is I think it will be visible by the end of this week and then officially published in the version of the Federal Register on Monday.

And there's a question from Shirley in the chat that I was going to go back to also. So when I jumped in to clarify that Daniel's explanation is not that we're changing the eligibility criteria, there's a nuance to that that I was kind of glossing over, which is that the eligibility criteria for program year '21 is, in fact, changing. And that's based on the language in the 2021 appropriation.

And so if -- you may have heard us say in prior conversations that that eligibility factor is going to apply to 2021, and we don't know for sure if it will apply to subsequent years because it's -- essentially, it's a rider to the appropriation. It may stick in there, or Congress may change it back. We don't know for sure, but we do know that for 2021, the eligibility, instead of being based on the poverty line itself, it's based on the 150 percent of the poverty line or the LLSIL.

And so, when Daniel talked through the changes to the formula, we're updating the formula in a way that tracks with that change to the eligibility. We're also actually very close to publishing some updated guidance about that eligibility factor. And so we're hoping to have that out the door pretty soon. I think it's close. And I do think we're going to have that out before the program year actually starts. So that's the answer there.

MS. HOANG: Thanks, Steve. And I think your response also answered the question about changing federal poverty guidelines to 150 percent as an eligibility revision. This is now real? Yes. It happened.

All right. And then the question -- oh, go ahead.

MR. RIETZKE: Oh, no. I was worried your audio cut out. I'll hand it back to you, Thoa.

MS. HOANG: OK. Thank you. This virtual switchboard.

Next question we have, "How are farmworker dependents accounted for in the formula, since the 50 percent income/time employed in agriculture would not apply to them, only to the farmworker?" So, Daniel, would you like to answer this?

MR. CARROLL: All right, Thoa. Sure. That's a really good question. The formula accounts for dependents when we look at household income, whether that household income is at or below 150 percent of poverty. So when you look at poverty rates, it looks at income in relation to household size. So dependents are accounted for in that manner.

Maybe the question perhaps gets that at intake, when you're assessing whether or not a dependent is eligible for NFJP services. I think you would look at the dependent's income at that point to determine their eligibility.

MS. HOANG: Great. Thank you. And that's the last of our questions, but I will see if there's any other questions in the main chat box.

I see Donald Green is typing. I wonder if this is a long question.

Oh, no. Audio is still here. We are just dissecting this question, but, Daniel, go ahead. You are -- you can share.

MR. CARROLL: Oh, thanks, Thoa. Yeah. Again, we're starting off in this formula looking at hired labor expenditure data from the Census of AG. And so we're looking at NAICS Codes 111, 1151, 112, and 1152.

And if I just -- just to confirm, I Googled quickly NAICS 112, which is the animal production subsector described as agriculture, forestry, fishing, and hunting. So we will -- we are picking up hired labor expenditures in fisheries, farmworkers who work with aquatic animals or plants, people that are fish farming, shrimp, or whatever it may be. So the answer to that is yes.

MR. RIETZKE: So there's -- it looks like there's one more question that came in about, "NFJP grantees are encouraged to be task-based when determining eligibility. Is there any concern that there could be farmworkers, like processing, that are not captured in the data?"

Daniel, I don't know if this is putting you on the spot too much into the weeds, or do you have thoughts off the top of your head on kind of how complete the data is in terms of the particular occupations or -- I forget if you're basing things on NAICS codes or SOC Codes or both. But do you have thoughts off the top of your head on that?

MR. CARROLL: Hi, Steve. Yeah. Off the top of my head, we are starting off with expenditures by NAICS, and a lot of the processing jobs are in NAICS -- are in manufacturing NAICS. So we wouldn't be, for the purposes of the formula, picking up some processing work.

That said, I think the USDA Census of AG considers processing workers to be agricultural workers, if they are processing -- if what they're processing, if at least 50 percent of that is -- comes from the same -- comes from the farm, essentially, where they're employed.

If it's a processing plant off location that's getting products from a number of establishments, farms, then those processing workers are probably going to be in a manufacturing NAICS. But there are some on farm processing workers that probably are going to be included in NAICS 111. So I think the answer is we're picking up some processing workers in expenditure data but not all of them.

MR. RIETZKE: Got it. Cool. Thoa, do we still have your audio? Is there anything else you wanted to say by way of wrapping up?

MS. HOANG: Yeah. I don't see any more questions. So if you would like to do the honors, you're welcome to wrap this up, and we can close out.

MR. RIETZKE: Oh, well, thank you. Well, I -- thanks to Thoa and Daniel and David for the presentation today and all the work that went into it. And thanks to all of you for tuning in. I hope this was helpful in kind of explaining what our thinking was and the reasoning behind the couple ways that we're tweaking the formula this year.

And, just to reiterate, part of it is that we're just trying to make sure that the way we're calculating things tracks with the updated eligibility that we've got in place for PY '21. And, again, because we're updating so much of the underlying data, we're resetting that cycle on the hold harmless. We've -- like we did a few years ago.

And, just to reiterate also, that the official Federal Register Notice should be most likely visible by the end of this week and hopefully published by early next week. So definitely take a close look at that. I think it's going to be open for two weeks or 10 business days once it hits the street.

And that will have instructions for how to actually submit comments, if you have them. And if you have questions that you want us to help explain, feel free. So encourage you to take a look at that and let us know if you have any comments. And, otherwise, thank you, again, for tuning in.

(END)