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AGRICULTURAL LABOR IN 1980: A Survey with Recommendations

A report by the Agricultural Employment Work Group

for the Agricultural Employment Advancement Project Center for the Study of Human Resources The University of Texas at Austin

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AGRICULTURAL EMPLOYMENT WORK GROUP

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This report is based upon discussions of the Agricultural Employment Work Group and represents the consensus view of the Group. It does not necessarily represent the position of any organizations with which the Group members are affiliated nor of the United States Department of Agriculture.

I. INTRODUCTION TO THE PROBLEM

The U.S. agricultural employment system is largely casual, which means that management and labor have relatively few continuing ties able to provide both an assured quality work force on one hand and adequate farmworker livelihood on the other. This stands in contrast to other industrial systems today where, for the most part, public and private sector mechanisms exist to strengthen bonds of mutual commitment between workers and employers in order to maintain a satisfactory supply of able and willing workers.

In recent years, however, changes have been taking place which are resulting in a reassessment and rethinking of the traditional farm labormanagement and market mechanisms. One change is the growing technical sophistication of agriculture. A more mechanized, highly technical and capitalized agriculture poses requirements for skilled manpower. Only a well-trained worker, for example, can operate the expensive and delicate equipment now commonly used in various commodities. Often these manpower requirements have not been readily met out of the existing farm work force. Quite apart from the imperatives of mechanization, there have been increased pressure from workers and an increasing realization among employers of the necessity of reducing instability and improving efficiency and economic returns to the agricultural employment system. Additional impetus for change has been brought about by the application to agriculture of employment, safety, health and other labor force standards already in force in non-agricultural industries. The exemptions from such rules which were traditional for agriculture are gradually disappearing, and agricultural employers are expected to find ways of complying. The effect is to require the agricultural industry to become as technically competent in managing labor as it has had to

become in managing its financial and physical inputs.

These changes have increased the incentive for agriculture to find ways to provide greater stability of employment. Workers, once well trained and experienced, are a valuable asset when the condition of expensive equipment and the productivity of other production inputs depend on their skill and dedication. Turnover costs of semi-skilled and skilled employees can become substantial when they include the cost of recruitment, training and attaining full proficiency. It is in the interest of employers as well as their workers to stabilize employment, resulting in a smaller, more compact labor force employed for a longer period of time.

Many farm employers have seen that their traditional employment patterns and practices are becoming expensive and less efficient, but they do not generally know what options they have to improve the situation. Whereas there are many sources, in both the public and the private sectors, to which they may turn for information about alternatives for financial and technological problems, there are as yet very few readily available sources of information about how to better manage the human element in agriculture. Where such information has been made available, farmers have shown themselves to be an eager audience.

It is clear that there is a need for a rather broad scale readjustment in the agricultural employment system. It is also evident that there are barriers that have made it difficult for this readjustment to take place. However the known record of instances where needed changes have occurred suggests that these barriers are not insurmountable, and there is growing evidence in the industry and in the work force of a desire for constructive change. USDA has the opportunity to provide leadership in promoting an improvement in

labor use to the benefit of both employers and their workers. To do so the agency must clearly understand the full dimension of the problem and where recent trends and innovations are leading the industry, and it must learn from these innovations and from those who have begun to assess their broader implications for the agricultural employment system.

II. RECENT TRENDS AND CURRENT PATTERNS

Most of the nation's farmwork is performed by farm families. However, the role of hired labor in farming is becoming more important each year. First of all, the proportion of farmwork being performed by hired workers has been growing steadily. Second, advancing agricultural technology increasingly requires workers possessing important skills essential to efficient and sophisticated operations. Third, the conditions under which agricultural workers live and work have been a matter of significant public concern in recent years, and the way in which agriculture is regarded by the public will in part be affected by how agricultural workers fare in the future.

There are many misconceptions about farm labor in the U.S., so some basic facts about current national patterns and trends are useful to consider. These national data present a summary view of agricultural employment and the work force that often obscures local and regional patterns, trends and problems. The average picture presented by national data may not portray the actual situation in any specific locale. In examining these national data it is important to bear in mind that there are substantial regional and commodity variations in hired labor use patterns and in the characteristics of the hired farm work force.

TABLE I. PERCENTAGE DISTRIBUTION OF THE HIRED FARM WORK FORCE, BY SELECTED DEMOGRAPHIC CHARACTERISTICS AND EMPLOYMENT AND EARNINGS, BY DURATION OF FARM WORK, UNITED STATES, 1979

Selected Characteristics	Short-term Seasonal (74 days or less)	Long-term Seasonal (75-249 days)	Permanent (250 days or more)
		percentages	
Race/Ethnicity			
White	78	. 67	72
Hispanic	8	18	. 18
Black	14	15	10
Sex .			
Male	73	80	96
Female	27	20	4
Age			
Under 25	69	44	31
25-44	21	33	44
45-64	6	16	22
65 and older	3	7	3
Residence			
Farm	14	16	34
Nonfarm	86	84	66
Migratory Status			
Nonmigratory	91	90	96
Migratory	9	10	4
Chief Activity During	1979		•
Hired farm work	6	46	85
Student	50	21	8
Keeping house	9 .	4	<u>-</u>
Nonfarm work	24	15	4
Other	10	14	. 4
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Number of Persons (00	00) 1,570	658	423
Average Days of All Paid			
Work, 1979	99 days	197 days	321 days
Average Annual Earnir from All Paid Work, 1		\$5,149	\$8,020
	4		

Source: The Hired Farm Working Force of 1979, Agricultural Economic Rpt, in press. ESS/USDA.

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- * Nearly three million people do hired farmwork sometime during the year. That is almost as many people as the number of farmers and their unpaid family members who work on farms.
- * The total demand for hired labor in agriculture is currently more or less stable, and is likely to remain so during this decade. There is even some evidence of a modest trend toward expansion. Although the demand for hired workers is constantly changing in regards to where and what kinds of workers are needed, the long-term decline in the number of hired farmworkers notable in previous decades appears to have ended in the 1970's.
- * One-third of all U.S. farms employ hired labor.
- * Most labor is hired by the largest farms. Less than two percent of all farms account for more than one third of all hired labor expenditures. However, many small farms also hire labor; one in five farms with gross sales of \$40,000 or less employ hired labor at some time during the season.
- * Hired labor use is concentrated primarily in certain regions:
 - -- Just ten states account for more than half the national farm labor expenditures. They are: California, Texas, Florida, Washington, North Carolina, New York, Illinois, Pennsylvania, Iowa, and Arkansas, respectively.
 - Together, California, Texas, and Florida account for over one-third of all hired labor expenditures in the U.S.
 California alone accounts for more than one-fifth.

- -- In different regions, different kinds of work are involved.

 For example, the West Coast states use more seasonal labor than does any other region, and over half of it is devoted to fruits and nuts. The other most intensive users of seasonal labor are in the Appalachian region, where over half the workers are in tobacco, and the Corn Belt, where over half work in cash grains and dairying.
- * As is the case for most farmers and their families, most hired workers do not depend on agriculture for their only source of employment or income.
 - -- Approximately 60 percent of hired farmworkers are seasonal workers who spend only a relatively short time during the year in agricultural work. These short-term seasonal workers are primarily students and housewives or nonfarm workers with second jobs in agriculture.
 - -- About 25 percent of hired farmworkers have a substantial commitment to, and dependence on, agriculture for their livelihood, but they are only seasonally employed. Nearly threequarters of these long-term seasonal workers are in the labor force most of the year, and roughly two-thirds work exclusively in agriculture.
 - -- About 15 percent of hired farmworkers are employed year round in agriculture. (This is about equal to the proportion of farm family workers having farm self-employment income only.) Some of these are workers who piece together a sequence of seasonal jobs.

- -- Migrants comprise only about 8 percent of the total hired farm work force, and there are only about half as many of them as a decade ago. They may be found in each of the above groups, although they are most heavily represented among the long-term seasonal workers. As a group, they are less likely to have non-agricultural employment. Although their numbers are small, they face unique problems not encountered by persons commuting daily to seasonal agricultural jobs from established homes.
- * The domestic hired farm work force is a very diverse group of people.
 - -- Over a quarter are racial and ethnic minorities who are proportionately more heavily represented among the long-term seasonal workers.
 - -- More than one-third are students who are primarily short-term workers.
 - -- A little over a third are heads of households or single individuals; the rest are spouses or other family members.
 - -- Education levels are low; less than half of all hired workers in agriculture 25 years of age or older have completed high school.

- -- Over half of all farmworkers are under 25 years of age; the median age is about 23 years. However, minority farmworkers tend to be significantly older as a group than do white workers. In the aggregate, the trend is toward a younger, and whiter, agricultural work force.
- -- Over three-quarters of all farmworkers are males.
- * There is a particularly high incidence of the working poor among farmworkers. They rank second only to domestic household workers at the bottom of the national income scale. Households headed by a farmworker average only about half the national mean income for all households having an employed head.
- * Some localized studies have suggested that farmworkers as an occupational group, particularly migrants, suffer abnormally high illness and accident rates and have lower quality housing than other broad occupational categories.
- * Many seasonal and low earning farmworkers are persons in the economy's redundant low-skilled labor pool. There are many such workers in the American economy, and farmworkers who successfully progress out of this pool are readily replaced by others. This depresses wages and working conditions of all who work in agriculture, and mitigates against improvement.

* Current national data are inadequate to provide insight into many important issues regarding agricultural labor. Many farmworkers are not identifiable as such in standard labor force statistics. And the principal sources of specialized statistics may be seriously undercounting the farmworker population. Furthermore national data obscure or "average out" many regional and commodity patterns, while reliable regional and commodity data are often unavailable. Finally, undocumented workers and youth are omitted in some farm labor force statistics although they are significant components of the nation's farm work force.

III. EMERGING MODELS AND OPPORTUNITIES

Here and there, in widely scattered parts of the U.S., innovative persons and firms in the agricultural community have been attempting to explore ways of resolving the increasingly central problems of agricultural labor. One approach has been for farmworkers to organize into unions and employ collective bargaining. In recent years much attention has been focused on collective bargaining activity in California, where unionization of farmworkers is most widespread. However there is a small but stable body of agricultural labor-management relations experience under collective bargaining going back many years in other parts of the country as well as in California. It is impossible to predict how widespread the agricultural unionization movement will become. But in any event a variety of mechanisms is needed to provide for improving agricultural employment for all workers, whether or not they are under collective bargaining agreements.

Perhaps an equally important story, and one that has received virtually no public attention whatsoever, is the progress certain imaginative and progressive firms have made in improving their employment and labor conditions through the application to agriculture of ideas and methods long used by progressive non-agricultural employers. These firms appear to be relatively few at present, and they deal with a variety of rather labor-intensive commodities. They also tend to be large and to have contact with personnel management practices in non-agricultural firms. They also have demonstrated considerable initiative and creativity. In general, they have sought to enhance the skill level of their workers, which has significantly improved productivity and reduced waste and other unnecessary expenses. From this increased productivity and efficiency they have paid higher wages and instituted a broad spectrum of fringe benefits. These improved wages and benefits have enabled farm employers to attract and retain higher quality workers, thus providing a stable source of trained and productive labor. In some cases job ladders have been established and upgrading programs developed which permit formerly unskilled field hands to qualify for supervisory, management, and technical jobs. In other cases, employment periods have been lengthened for some workers, even though this has tended to mean that the total number of workers hired declined. In short, fewer people have had work, but those that have had it enjoy greater earnings and better employment conditions.

There are of course limits to how far labor stabilization measures can be applied. Some peak seasonal labor will be needed for the foreseeable future, and while there is some evidence that both productivity and wages for much of this labor might possibly be improved, it also is obvious that the potential

for creation of long-term jobs has limits. At the same time, it is worth recalling that many participants in the agricultural work force, such as students, are not seeking long term employment in agriculture.

Despite the fact that these modern, systematic approaches to labor management have their limitations and are far from a cure-all for all agricultural employment problems everywhere, those experts who have studied their application in agriculture tend to feel strongly that applying them more broadly in the sector would markedly improve both the welfare of workers and the stability of labor supply to employers. Looking at the experience so far, through research reports and observation, they find that modern personnel management has had the following effects where it has been implemented in agriculture:

- 1. It has had a favorable impact on farm worker income.
- 2. It has increased employment stability, reducing turnover, lengthening worker employment, and providing a more reliable and adequate supply of labor.
- 3. It has improved labor productivity, for both seasonal and non-seasonal farm labor.
- 4. It seems to have improved the attractiveness of agricultural working conditions, leading to fewer accidents, better employeremployee relations, and other benefits.
- 5. It has resulted in enhanced worker dignity and a better quality of life, which is reflected in such indicators as increased home ownership and participation in community affairs.

- 6. It has provided more opportunities for self-determination as workers acquire additional skills, accept increased responsibility, and become more self-directed in developing themselves.
- 7. It is not inconsistent with, or antithetical to, collective bargaining, which can be interpreted as an extension of self-determination.
- 8. It has structured the farm labor market, thereby restricting entry of more casual, less productive workers including youth and the elderly.

Some of the potential benefits from improving farm personnel management practices can be glimpsed in a few examples:

Progressive farm labor practices can be found at several establishments in lemon harvesting in the coastal valleys of central California. Perhaps the most widely publicized is the case of Coastal Growers, a farm cooperative association organized in 1962 by 270 citrus growers near Oxnard, California to harvest their lemons. In 1965 they hired a professional personnel manager to manage their hired workers. The results have been striking. First of all, the association has not had a labor shortage since 1967, although other firms in the area have experienced them periodically. Second, there has been an astounding increase in efficiency and productivity. With imported "bracero" workers in 1964, worker productivity averaged less than 4 boxes per hour. In 1980 productivity had risen to $8\frac{1}{2}$ boxes per hour, and this increase occurred with no mechanization or significant change in harvest technology. As the manager explains the difference, "Every picker we have now is a real 'pro'." The benefits to workers were equally impressive. Between 1965 and 1978 wages at the association rose 218 percent versus 139 percent for all California farmworkers. Average annual earnings rose from \$267 to \$3430 as the number of workers was reduced and the average worker extended his work period from

17 to 89 days. (During this period, labor costs rose only 26 percent.) In addition, workers are covered by liberal association fringe benefits including paid vacations, health and hospitalization insurance, retirement and savings plans, and seniority rights. Significantly, they have promotional opportunities. Virtually all association employees, including bookkeepers, computer operators, and supervisory staff, began as lemon pickers.

A second example is a large diversified agricultural producer in southern Florida which sought to reduce a high turnover rate in its work force. Located in an area where housing was a perpetual problem for seasonal workers, the company decided to offer the inducement of above average worker housing. After finding government housing programs too restrictive or costly, it financed the project privately. Construction was completed by early 1977 and included 192 units, a church, day care center, post office, and laundry. The complex houses about 800 employees and family members. Seasonal workers have employment of about seven months out of the year, and any family wishing to work elsewhere in the off-season can retain occupancy of its unit and resume residence on returning. This provides the worker family with a permanent home and good housing conditions, and has proved a strong incentive to return. The company says that turnover for employees living in the project has now been reduced to less than two percent annually.

The shade tobacco industry in Connecticut and Massachusetts provides about 5000 jobs for high school students in the delicate task of harvesting cigar wrapper leaves. The industry is a major employer of youth in the local area, and also employs groups from states as distant as Mississippi. Most youths are recruited through their schools and are often accompanied and supervised by teachers. Members of the grower's association provide excellent

housing and off hours recreational programs for nonlocal youths. Present and former employees are surveyed to learn about their attitudes toward their employment and human relations training programs are conducted for supervisors. A program of premiums and incentives is offered to control absenteeism and to encourage students to remain through the season. A study of this employment program conducted by the University of Hartford concluded:

"For thousands of young people (this employment) serves as their introduction to the world of work This is an important responsibility and, from the findings of this study, we conclude that the industry is performing this task satisfactorily."

A different sort of problem was faced by a large association of canners and freezers in Wisconsin, where harvesting of vegetables is normally done by the processor rather than the grower. The association was faced with a serious problem getting skilled labor to operate and maintain the increasingly sophisticated equipment used in their operations. The problem ultimately was resolved by establishing a well organized apprenticeship program in which cannery and field seasonal workers could be upgraded to these more skilled and longer term jobs. The program has graduated 279 maintenance mechanics from a 4 year apprenticeship course and currently has 128 apprentices in training. A number of former apprentices have gone on to become supervisors and managers in their respective firms. It would not have been cost effective for any single firm to have tried by itself to establish and operate this program, but the association proved to be an apt instrument along with the Department of Labor. For the last ten years the individual firms and the association have operated the apprenticeship program on their own. The quality of the training and the completion rate are excellent; in fact, the Wisconsin state official

overseeing apprenticeship program standards has remarked that they consider this agricultural program to be perhaps the best apprenticeship program in the state.

A typical short season harvest situation is faced by one of the nation's largest apple growers, located in Pennsylvania. With long experience in managing seasonal labor, this firm has instituted an aggressive employee relations program to assure an adequate number of workers each year. This is particularly important since the firm's orchards are located in an area having so small a local population that virtually all the harvest labor must come from the outside. Also it is in an industry in which many growers find themselves perpetually short of harvest labor and which has been a major user of legally admitted temporary foreign (H-2) workers. This firm, on the other hand, uses nothing but domestic workers (about half of them Puerto Rican), has a rather stable work force (over 85 percent of the workers each year are returnees), and gets high quality work. To do this, the company maintains contact with its workers during the off-season, assuring them they are wanted in the next harvest and using them to recruit other workers as needed. During the harvest, close attention is devoted to employee relations, and especially to setting fair piece rates for blocks of trees having special characteristics, ensuring that all workers will have equal earning opportunities. Also, the rate per bin picked varies with the size of the crop and the difficulty of picking it so that wages to the workers are consistent with the level of effort expended. It is reported that a Puerto Rican Secretary of Labor told one of the firm's officials that it is highly regarded throughout the island as a model employer. The company says its workers are more productive and consistently earn more than do other apple harvesters on other farms in the region. These four cases are difficult to compare, for they illustrate the diversity of labor problems and possible solutions. What they have in common, however, is the characteristic of having tried to attract or retain labor by becoming more attractive as employers. All four met with successful results that, in one form or another, benefitted workers and at the same time permitted the firm to remain competitive. It is significant that all of these programs were established by managers who knew and subscribed to basic concepts of modern personnel management, and who found ways to apply them creatively to solving labor problems in their own firms.

It is reasonable to ask why, if these personnel management approaches work, they have not already been more widely adopted by agricultural employers. There seem to be several answers. For one thing, not many farm employers are even aware that such options exist; the word just is not out. Also, there is something of a built-in size bias. Those employers most likely to be aware of these options are large firms who can hire industrial relations or personnel managers, many of whom have had experience outside agriculture, who are specifically the carriers of this expertise. In addition, these larger firms are more likely to be able to handle the additional complexity of maintaining a formal personnel management system.

It is worthy of reflection that a typical university graduate in farm management subjects normally will have taken many classes on how to plan and manage physical and financial resources for the farm, but rarely will have encountered a single course on management of human resources. This omission was, perhaps, understandable when hired labor use was less important and appeared to be diminishing, but continuing to ignore labor management principles now that hired labor is a significant and growing component of the total labor

force in agriculture seems shortsighted indeed. In contrast, most university curricula in general business management place considerable emphasis on the effective management of people. This same "blind spot" in agriculture exists in the private sector's services to the industry. While there are many consultants that farmers can turn to for advice in managing their land, machinery, chemicals, or money, there are very few who can competently assist employers, labor contractors, farmworker organizations or others in matters pertaining to agricultural labor management. As a result, not only do most farmers not know about alternative approaches that might be helpful to them, but even if they did they probably would not be able to obtain good advice on how to implement them. In short there is a dearth of readily available information that farmers can make use of.

In some places, particularly the larger labor using states, there have been public sector efforts to assist in developing, disseminating, and applying information about better personnel management practices. In some states the Cooperative Extension Service has been active in an educational and supportive role, and in Texas and California other agencies (such as the Employment Service, community colleges, and U.S. Department of Labor farmworker program contractors) have been involved as well. There are indications from this experience, although only a few years old, that public agencies can indeed effectively facilitate the adoption of practices, by employers and by training agencies, that will result in improved employment patterns to the benefit of all concerned.

In California, for example, a follow-up survey of 85 employers who attended labor law and personnel management seminars jointly sponsored by University of California Cooperative Extension and the State Employment

Development Department indicated that the majority had in fact instituted in their operations one or more things they had learned in the seminar. In the same state, employer interest has been intense and steady, and such seminars are normally filled. A farm advisor working exclusively in personnel management matters has had an excellent reception, and the program is now being expanded under special state funding. In short, there is good reason to think that farmers are interested in this sort of information and will listen to it, and that public agencies have the ability to help disseminate it effectively.

It is often said that problems of agricultural employment cannot be resolved as long as there is a plentiful supply of undocumented alien labor available for the asking. Obviously the availability of a large supply of unskilled seasonal labor provides an alternative source of workers which reduces the incentive of some employers to develop alternative labor market and labor management strategies. However it does not solve the basic problems giving rise to the need for change, namely the need to upgrade skills and stabilize the labor force. Where employers realize the need to improve their labor practices, the evidence suggests that availability of illegal entrants in the work force does not constitute a formidable barrier to change. For one thing, there is considerable evidence that long-term investment in improving labor skills pays off in higher productivity--even for relatively unskilled jobs such as harvesting fruit--and there is some reluctance to invest in workers (such as illegal aliens) who cannot be counted upon to remain in the job over an extended period of time so that the investment can be recouped. Also, many employers simply want to be good citizens and are happy to give preference to legal resident workers when they can

remain competitive by doing so. Nevertheless the influx of illegal entrants poses difficult problems for employers, the domestic work force and labor policymakers. The problems and their ramifications must be better understood and addressed in a realistic manner.

The point regarding competitiveness is important. Apparently some firms have found that the implementation of modern, systematic personnel practices enhances their competitiveness across the board. Others, however, have found that such practices are competitive only so long as there is just, equitable, and uniform enforcement of labor-related laws across county and state jurisdictions. In some cases, the current economic environment and labor supply are such that progressive personnel policies are competitive. In other cases, however, the uniform enforcement of labor laws and regulations are critical in preventing undercutting of progressive practices and in maintaining an environment in which innovation can flourish. In general, economic incentives to progressive personnel management are growing; the legal environment, however, now varies from place to place as a result of public policies being unevenly applied.

Incentives help guide the alternatives agricultural firms will choose in providing for their manpower needs. Right now, firms in many places and commodities face real choices regarding whether they will opt for labor systems stressing large crews of very transient workers, or whether they will organize their operations around more stable and permanent employment patterns. The first approach leads to further demands for large numbers of seasonally available workers, such as aliens either legally or illegally working in the U.S. The second leads to a probable reduction in the numbers of people doing agricultural work and demands higher skills among those that remain. Farming operations may themselves change to reflect measures to

assure an adequate labor supply. A move away from reliance on a large, casual standby labor pool probably means that farmers must provide more continuous employment to retain their workers or they must reduce their labor needs.

A variety of approaches to improving the continuity and stability of employment and income can be observed in practice. In some instance farmers have restructured their cropping programs in such a way as to smooth out and extend labor requirements. Employment continuity has been promoted through the formation of employer operated labor pools in which groups of farmers jointly manage their labor through a central service, by union hiring halls in which organized labor assumes the duty of maintaining the labor pool, by labor contractors who retain employees by scheduling them to work a variety of farms, and -- in an apparently shrinking number of cases -by the Employment Service through matching workers to employers. In some cases workers have bargained for higher rates of pay to off-set the loss of earnings during the off-season. Unemployment insurance also helps stabilize the incomes of workers in seasonal activities. Development of complementary seasonal farm and nonfarm jobs has been promoted, though apparently with limited success. One of the more interesting developments that has tended to reduce seasonality has been the introduction of new varieties. The Valencia Orange, for example, was an existing variety which significantly extended employment periods when it was introduced in Florida. A new hot weather peach was genetically engineered to be harvested when the winter citrus and vegetable harvests had passed their peak, and may also be having an employment extending effect in parts of that state where it has been introduced. It should be noted however that, on balance, genetic technology has had the effect of shortening the labor season (such as by development of

tomatoes that ripen all at once for machine picking) rather than lengthening it. The point is, nevertheless, that there are a variety of strategies available for enhancing the length and continuity of agricultural employment which are presently being used successfully by at least someone, somewhere. It seems clear that there is far more potential in these approaches, or in combinations and variants of them, than is currently being realized.

An alternative to enhancing employment continuity is to reduce dependence on hired labor, and in fact this is a route commonly taken by growers in the past in response to seasonal labor problems. Mechanization is the primary means by which this is done, often in conjunction with one or more of the continuity enhancement approaches described above. There is considerable indication, however, that the rate of growth in mechanization has slowed significantly as mechanical refinements have become more difficult, less efficient, and more costly to purchase, and increasing energy costs may be changing machine-labor cost relationships. In certain crops, such as grapes, for example, mechanization gains are still likely to be dramatic, but the national trend seems to be slowing. It seems clear that while mechanization will continue to replace unskilled manual labor, and the need to facilitate the adjustment of workers displaced by mechanization will continue, the need for hired labor, particularly in the more skilled agricultural occupations, will continue and even increase.

Practically all of the mechanisms for improving the quality of agricultural employment and assuring an adequate manpower supply in agriculture involve expanding the skills of workers. In some cases this means expanding the variety of jobs they can do; in others it means upgrading their skills to a more sophisticated level. In either case, there is a definite trend toward a requirement for workers who can deliver higher quality labor services. Thus, there

is at present the paradoxical situation of agricultural employers seeking skilled workers at attractive wage levels while at the same time field hands are idle much of the year. The problem is that mechanisms that could resolve this paradox have so far not been focused on the problem. Most secondary and post-secondary educational institutions active in training for agriculture focus primarily on preparing farmers, farm managers, and certain types of high level technicians. In very few cases are these programs aimed at, or frequented by farmworkers or their families. Most skill training programs aimed specifically at farmworkers are designed to provide them with nonagricultural skills.

In a few cases where programs have been designed specifically to upgrade agricultural skills, and where good agricultural jobs requiring these skills existed or were created, the results have been gratifying. An indication that such an approach can be beneficial to both employers and workers has been the success of a few pilot projects in local agricultural communities to provide training for both growers and farmworkers. The most advanced of these is in Fresno County, California, where training and assistance have been provided to growers to restructure their labor utilization practices, combining seasonal tasks into longer term jobs, creating job ladders and instituting other progressive labor management practices. At the same time worker training programs were established to enable farmworkers to acquire the range of skills required by the new jobs and by the increasingly sophisticated agricultural production technology employed by growers. The County's growers, farmworker program operators. vocational training institutions and other manpower service delivery resources were organized in a coordinated effort to meet the area's agricultural manpower and farmworker employment needs. The approach has received the enthusiastic endorsements of both the grower and farmworker community and initial results have been extremely positive.

Federal programs earmarked specifically for occupational training of farmworkers were authorized under Title III of the Comprehensive Employment and Training Act (CETA) administered by the Department of Labor. Training activities are conducted by local program operators under contract to DOL. The program was conceived as a means for low income, seasonally employed and displaced farmworkers to acquire occupational skills that would qualify them for more stable employment and higher earnings. Because few such employment opportunities existed in agriculture these programs had the effect of training farmworkers to move out of agriculture. However in response to the expressed desire of many farmworkers to remain in agriculture and the development of good job opportunities in the industry for which skilled workers are needed, the CETA farmworker program regulations have recently been modified to facilitate training in agricultural skills. DOL farmworker program operators have begun expressing interest in exploring ways in which their substantial training resources and rapport with the farmworker community can be utilized to prepare economically disadvantaged farmworkers for those agricultural jobs offering good earnings potential and stable incomes.

No mechanism presently exists for helping CETA farmworker program operators to identify the existence of high quality agricultural jobs or the training needs that would qualify farmworkers for these jobs. Neither USDA nor DOL have articulated agricultural manpower development needs in agri-

culture at this level, and farmworker program operators and agricultural employers have not, as a rule, developed working relationships in very many locales. In the past these two groups have tended to view one another with antagonism, and cooperative working relationships to solve mutual problems will have to be developed against such a background. It would appear that both USDA and DOL could be of considerable assistance here.

Historically, the U.S. Department of Agriculture has had little involvement with problems of agricultural labor. Until recently the subject has been treated as entirely within the purview of the private sector and the Department of Labor. However labor is a critical input in most agricultural production, and disruptions and inefficiencies in the agricultural labor system have strong prejudicial effects on the commodities involved and on the health of agriculture as a whole. Sometimes it is pointed out that labor expenses run only about 9 percent of total production expenditures in agriculture. What is missed, in this perspective, is that in many commodities the labor bill is a third or more of total production expenditures, and farmworkers are in many places a large and visible segment of the agricultural community.

In a few states, however, certain individuals related to USDA programs have been dealing with one or more aspects of farm labor questions. University and Cooperative Extension personnel here and there have become increasingly interested in the area of improving personnel management practices in agriculture. Some solid research and field work have been produced, and seminars have been given for agricultural firms on various aspects of improving their personnel management system. Through these experiences, a small cadre of agricultural labor experts is beginning to emerge within the USDA-related network. It is producing information and ideas valuable to farmers and

workers alike, and it is winning new adherents to more mutually beneficial practices in managing agriculture's human resources. These individuals are currently important largely because they have shown what can be done. They still are so few and so thinly stretched that their sector-wide impact is virtually nil. They need help and support. They have met with more industry demand and enthusiasm for their services than most of them had expected, and they are likely to become sought after not only by employers, but by other agencies serving farmworker needs as well. There is some evidence that these innovators, in reaching out to deal with farm labor problems, have achieved acceptance by the agricultural industry before they have been accepted as important in USDA and the land grant universities.

In many areas of the U.S. housing is a critical factor in being able to attract an adequate seasonal work force and in maintaining seasonal workers at a reasonable standard of living. This problem has been recognized in specific farmworker housing authorizations in USDA's Farmer's Home Administration programs. There is considerable debate over who should be responsible for providing this housing and under what conditions. However the end result appears to be that the USDA farmworker housing program is not working well, especially for temporary in-stream migratory worker housing, where there is an especially critical need. While the reasons are unclear, the program apparently is tied up in unrealistic criteria and regulations. Given the potential importance of housing as an instrument of agricultural employment policy, it merits a rigorous review.

IV. CONCLUSIONS

In summary, the agricultural employment situation is appropriately viewed in two perspectives, one critical and the other optimistic. There is, first of all, little disagreement that traditional practices are rapidly becoming outmoded, which causes serious trouble for employers and workers alike. In general, the traditional reliance on a casual, informal system of labor management and labor market practices is not well adapted to new situations resulting from the massive economic, technological, and legal environment changes that have shaped agriculture in recent years. It is a structure which reflects a simpler, less organized agriculture of an earlier time, and which is not suited to addressing the needs of a far more technically and organizationally sophisticated agriculture of the 1980's and beyond. In many quarters both producers and workers see that the current system is struggling, and that something else is needed. What they do not see clearly is what other options lie before them. This may be particularly true for smaller farmers, who use the same basic technologies as do larger producers and who draw on essentially the same labor supply. They share all the vulnerabilities of their larger compatriots without having the informational and other resources available to bigger units. Not only is the system becoming out of date, therefore, but it also is not transmitting to farmers and workers reliable information about creative and beneficial responses they can and should make. The result is that effective dissemination of innovations simply is not occurring in matters related to human resource management. Our current system is becoming outmoded, and is not doing a very good job of correcting itself.

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The optimistic perspective is that agriculture has managed to generate within itself a core of innovations and resources for attacking these difficult and complex human resource problems, and in a few isolated instances public programs have experimented with ways to expand those innovations and resources. These have not been systematically disseminated in a way that can be acted on in the private sector, and many more developments and refinements are urgently needed. But the fact remains that the USDA and the agricultural sector are not facing intimidating human resource problems totally unarmed. Some excellent ideas have been articulated, some stimulating research has been done, and some promising experiments have been launched. USDA has a fine place to begin. It also has the institutional structure and capacity to research, develop, and disseminate new ideas and their applications. It has available to it, either in-house or through other agencies, substantial public funds which can be in part devoted to helping agriculture reform its human resources management practices. Most importantly, however, it has a community of farmers and workers who would like to see the problems resolved, and who, if properly informed and involved, can be expected to make the reasonable adjustments needed to resolve them.

There is a lot to be done, and it will take a long time to accomplish, but progressive agricultural employers have shown what is possible. The community as a whole, with sensitive assistance from the USDA and other government agencies, can build upon the progress achieved to date.

V. RECOMMENDATIONS

Because questions and issues regarding the structure of agricultural labor systems in the U.S. are thorny and complex, the immediate question before the Department of Agriculture is less how to resolve them all than it is how simply to get started in some significant way that will be helpful. Where could the Department begin, and what could it hope to accomplish in the first few years?

A. General Policy Perspective

Probably the most important single thing that the USDA could do at this time would be to establish a positive departmental policy to actively develop and protect human capital in agriculture. The effect will be to make the same commitment to developing the potential of human resources that the Department has made to developing the potential of physical and natural resources. While people, both farmers and hired workers, are not the only resource the USDA should seek to protect and develop, they are the one that makes all the others work together. As such, the skills and dedication of all people working within the agricultural sector are worthy of high priority attention.

There are certain facts that an effective human resource policy for agriculture must recognize, particularly as it applies to agricultural labor.

First of all, it must be recognized that national employment policy is aimed at eliminating the underemployed and unemployed low-skilled labor pool. A host of federal programs and policies are devoted to improving employment alternatives and the employable resources of the disadvantaged,

undereducated, non-English speaking, and other groups who for many years have been the mainstay of the seasonal agricultural work force. As mentioned previously, the Federal occupational training program targeted specifically at farmworkers has trained them primarily for nonagricultural jobs because that is where the good jobs were. The national commitment to providing our citizens with good job opportunities, and human resources to qualify for them, is surely strong enough that it will overshadow claims by any sector that such programs are jeopardizing the supply of labor for poor and intermittent employment opportunities.

Secondly, the surplus unskilled labor pool has not been a good source of the quality labor agriculture increasingly needs. Adequate quantities of qualified labor will be attracted to enter and remain in agriculture only when the wages and working conditions available there are competitive with those of other employers also seeking such workers. Agricultural employment must offer competitive wages and working conditions if it is to be considered a legitimate recipient of public resources devoted to upgrading employment of the economically disadvantaged labor force. Agricultural employment policy must be devoted to finding ways to make agricultural employment competitive, not based on policies to maintain a labor force which is available only because it has no better alternatives.

If the incomes of agricultural workers are going to rise, as they must if agriculture is to have an adequate supply of labor, this makes it critically important to improve labor productivity in order to pay for these higher wages, fringe benefits and other forms of worker remuneration. In many

agricultural jobs productivity is still quite low. Low labor productivity and inefficiency entails costs to producers and workers alike. Without sustained productivity increases, increases in farmworker income can come only through increased production costs. Even with improved productivity it is likely that some of the costs of improving farmworker welfare will ultimately have to be borne by consumers through higher agricultural product prices. But a cheap food policy should not be maintained at the expense of farmworkers or farmers. It has been an implicit principle of U.S. labor policy that substandard employment practices are not justified by their impact on product prices.

In order to raise labor productivity, it will be necessary to move away from highly casual labor patterns and toward more employment stability. That is because worker training and accumulated experience are necessary to raise productivity, and employers will need to retain employees longer in order to recoup investments they make in developing those work skills. Growers are unlikely to make investments in people they know will not be available to them long enough to produce returns on that investment. Similarly workers will be reluctant to invest in improved skills that do not give promise of sustained employment and good incomes.

in order to retain workers in a more stable form of employment, the quality of the work they do will have to be upgraded. Advancement opportunities, better working conditions, and amiable and respectful relations between workers and employers are but a few of the improvements that need to be made in the agricultural work environment.

Taken together, the above improvements should improve the overall quality of life for agricultural workers. Still, in many places, efforts need to be made to ensure that as a group they will be able to enjoy health,

housing, education, social acceptance, and other benefits of community on an equitable basis with other labor force participants. While this is important for all farmworkers, it is particularly important for migratory workers, whose temporary status in many communities in which they live can easily lead to social alienation and isolation.

Finally, as befits the most fundamental objectives and commitments of this nation as a free and democratic society, an effective human resource policy will seek to provide expanded options for all people, including those in agriculture, to determine the course of their own lives. People should not remain in farming, either as farm operators or as hired workers, because they have no other decent options to make a living.

Therefore, in sum, the goals of a human resource policy for agriculture should include:

- 1. To improve farmworkers' annual incomes;
- To increase productivity and improve efficiency in the utilization of agricultural labor;
- 3. To stabilize employment patterns;
- 4. To improve the quality of agricultural work;
- 5. To improve the quality of life of agricultural workers; and
- 6. To expand options for self-determination.

Taken together, these goals address the needs of both employers and workers, indicating that the well-being of each group is in the long run inextricably bound to the welfare of the other.

B. Program Recommendations

In implementing an agricultural human resource policy, priority should be given to those farmworkers who have the greatest occupational commitment to agriculture. Highest priority should be accorded the 25 percent of hired farmworkers who have a substantial commitment to, and dependence on, agriculture for their livelihood, but who now are only seasonally employed, and to the 15 percent who are year round workers. The main challenge is to improve the employment of those people who are highly dependent on agriculture but who are not finding the quantity or quality of work they need to escape poverty. There are likely to be fewer opportunities for casual workers in a more structured agricultural labor force, but those which remain should also benefit from changes that improve the welfare of the most heavily committed farmworkers.

Priority attention also should be given to those sectors of the agricultural industry requiring particularly large amounts of labor, for in some of them survival probably depends on being able to successfully meet their labor needs at competitive costs. The challenge here is to make these industries more competitive in the labor market and the commodity market at the same time.

In approaching these challenges, the USDA should assume leadership in bringing together the various necessary elements of the whole agricultural community in a sustained working relationship. It should emphasize to all its responsibility to safeguard the long-term health of American agriculture as a whole, and that this will mean being concerned with the welfare of all the people within it.

Fortunately, there are a number of very important activities the USDA can undertake which will benefit both workers and employers, and which both groups, once properly informed, should be able to support with enthusiasm. The following are particularly recommended, and are collected into two priority groups.

Top Priority

1. A major effort should be made to educate employers, farm labor contractors, workers and their organizations, and others in the practical potential for improving personnel management practices in agriculture and for developing a more structured labor market, as well as in the benefits from doing so. There are many helpful things that can be done at the farm level, especially with the involvement of community institutions, and the USDA should take a leading role in facilitating their dissemination. It has superb resources for the job.

Two available resources which USDA can influence have strong potential for effecting improvements in human resource management in agriculture: the Extension Service (especially at the state level), and agricultural industry leaders who have shown that improvements are beneficial and can be accomplished at competitive cost. USDA should mobilize these two resources in a program of education, training and technical assistance that has credibility with farm employers and farmworkers and their organizations. This approach has the advantages of being positive and constructive and of building on existing strengths within agriculture. Also such an endeaver is consistent with the role and function that the Extension Service has played regarding other issues in the past.

Such a program could consist of the following elements:

- a. Identify innovative and progressive practices in farm labor management and farm labor market operations across the country and study and disseminate the results of these practices. There appears to be a considerable amount of innovation and experimentation taking place across the country, and progressive labor management practices and systems have been developed that apparently can operate at competitive cost. However, other than two studies of the Coastal Growers Association in Oxnard, California, little or no authoritative documentation of this experience is available. There is an urgent need for careful case studies of current innovations and their results, and the dissemination to farmers and others of practices that have been found effective in practice. In addition research and development of a more experimental nature with concepts that have so far not been introduced into actual use, should be encouraged. This research, especially into current practices, can and should be started immediately.
- b. <u>Development of teaching/training materials for farm labor management.</u>
 Instructional materials on farm labor management are sparse, and those which exist do not get widespread distribution. What does exist focuses mainly on explaining laws and regulations relating to farm labor. Of course, there exists a large body of materials on the subject of personnel management generally, but it needs special adaptation to agriculture so that employers can make use of it.
- c. <u>Development of personnel trained in modern farm labor management</u>

 practices. Presently there is only a small cadre of individuals with expertise in personnel management as it applies to agriculture and labor economics

applications to agriculture. Any significant increase in educational, research or other programs will require expansion of this pool. Significant demand for such persons could develop in the private sector as well. An assessment of the demand for professional personnel with agricultural labor and labor management capabilities should be made, and, if found justified, measures to expand the pool of professional personnel taken. This might include encouraging the development of courses in personnel management and administration as a part of the core curriculum for college programs aimed at educating managers of agricultural enterprises. At the same time, measures to improve the skills of those presently involved in agricultural personnel management practice and training should be pursued. Such vehicles as workshops, seminars, short courses, publications and other learning tools could be developed and made available through appropriate channels.

- d. Expand the number of local farm advisors who have expertise in farm labor management. These individuals should be targeted on counties with high usage of hired farm labor. Of course, before such positions are created, a cadre of individuals with expertise in farm labor management must be trained and developed. If a larger number of such positions suddenly were made available today, it is certain that sufficiently qualified candidates could not be found to fill the jobs.
- e. The Extension Service in each state with a high usage of hired labor should have a staff specialist at the state level who works full-time to improve farm labor management practices and upgrade agricultural work.
- f. The formation of a professional association for farm labor managers should be encouraged. Currently, probably less than a dozen farm labor managers are members of national professional personnel associations. Con-

sideration should be given to forming an association for farm labor managers both to upgrade the status of the personnel function in agriculture and also to provide a network in which farm labor managers could communicate and learn from one another. If possible, this association should not be completely isolated and separated from established personnel groups. Rather, it might have some affiliation and interchange with national associations for personnel administration.

- g. Throughout the program, a variety of industry leaders should be incorporated into the education process. At every opportunity, forums should be provided for farmers to tell other farmers their story. Because agricultural employers can best identify with other agricultural employers, such presentations will have the most credibility. Experience in California has shown that while some agricultural employers may be reluctant to speak out at first, many will drop their initial resistance once the process gets started.
- h. Farmworker organizations can be a significant resource in developing improved personnel management practices and a more skilled work force for agriculture. They need equally to understand the basic principles of good personnel management as well as do the farmers, especially those organizations providing training to upgrade farmworker skills. They must be able to explain to workers how to relate to and understand their responsibilities and rights under more systematic personnel management systems.
- 2. The USDA should improve its agricultural employment statistical base. It should work together with other relevant agencies, especially DOL, in developing common concepts and definitions designed to inform policy and program decisions. It is important that these data be valid and that they be

disaggregated to meaningful levels, including at least those states using large numbers of farmworkers, so that regional differences can be identified and reflected in better targeted programs. High priority should be given to providing a more accurate estimate of the number of farmworkers than presently is available. These estimates are needed, among other reasons, for purposes of allocating fairly among states the various Federal resources for programs targeted specifically for farmworkers. The data should elucidate the composition, income and working patterns of farmworker households, not just individuals. Finally, they should provide more insight than we have at present into commodities and specific functions of the work agricultural workers are performing. Without a reliable and detailed statistical base the development, implementation and coordination of agricultural labor policies and programs with each other and with employment programs in other sectors of the economy are likely to prove very difficult.

3. The USDA should use its good offices with DOL to help assure that labor-related laws and regulations are enforced equitably and uniformly within all jurisdictions, so that firms operating in strict compliance with the law are not competitively undercut by firms able to profit from officially sanctioned exemption from enforcement.

Many laws and regulations are meant to guarantee to workers certain protections and benefits that represent net costs to individual employers, and therefore it is necessary that these costs be borne uniformly in a highly competitive sector like agriculture. No group of agricultural employers, whether by commodity or place of operation, should be provided a competitive edge by virtue of de facto exemption from rules meant to apply to all employers and which are enforced among employers in other commodities or locales. By

the same token, no group should have to suffer a competitive disadvantage from atypically rigorous or punative enforcement. Enforcement agencies need to ensure that enforcement is uniform and just, which does not now seem to be the case.

Although USDA should take an interest in advocating fairness of labor laws as they are applied in agriculture, it should not become an enforcement agent. Enforcement of labor laws and regulations should remain the purview of the Department of Labor. USDA would lose its ability to be an effective provider of information and technical assistance services leading to changes in labor practices if it were also to become involved in enforcement. Certainly there is a lesson to be learned from the experience of the Employment Service which, as it has become saddled with enforcement responsibilities, has become virtually ineffective as a job information and placement vehicle in agriculture. As a result, it provides job matching benefits neither to workers nor to employers.

4. The dialogue recently begun among select employers, researchers, and worker organizations should be maintained for at least two years in order to allow the group to further refine and expand upon the work it has accomplished to date. This ad hoc Agricultural Employment Work Group should operate as an independently established (through separate project status) research and discussion group in which the most creative and informed minds on agricultural employment matters can be brought to bear on the most pressing problems.

Second Priority

1. USDA should sponsor significant research into viable options for improving agricultural employment. To do this, it should attempt to direct some portion of the research budget to focus specifically on human resource issues and problems in agricultural production. A committee comprised of grower, worker, government, and other representatives should be established to advise the Department on expenditure of those research funds.

In addition to research into labor management and labor market processes described in the preceeding section, research is needed that seeks to apply technology to the solution of farm labor problems. The USDA and its related institutions have been very successful in developing technology to meet a variety of agricultural production and marketing objectives. It seems likely that technology can be developed to meet employment-related objectives as well. The research process is not one of chance; research organizations clearly respond to the needs of the clientele being served and to the availability of funds to support the research process.

With regard to agricultural employment, the rapidly expanding horizons in the area of genetic development in crops are especially exciting. New developments in this science promise technological flexibility and options that only a few years ago were beyond dreams. There is no technological area in which the power and presence of the USDA is so great. In recent years, genetic research on agricultural crops has been directed to objectives that favored capital at the expense of labor. For example, plant varieties commonly have been developed specifically to permit more efficient mechanized harvest. On the other hand, little attention has been devoted to the development of

plant varieties that might help stabilize employment. Yet, as the example of the hot weather peach in Florida suggests, varieties can be developed which will have the effect of providing work during what now is the offseason. If this is to be done, however, it will have to be coordinated with substantial market research to ensure that the products will be viable and competitive in the marketplace.

It may be useful to consider three distinct types of technical research objectives or approaches to employment. One thrust would be to improve the productivity of farmworkers. Another would be to extend the duration of their employment and reduce seasonal fluctuations. Still a third would be to improve their work environment. Good research projects might well encompass these directions in combination.

It is important that the improvement of agricultural employment structure be recognized as one of the several legitimate objectives by which research on new technologies is assessed. There is now a strong reason to place employment objectives alongside and equal to traditional objectives of enhanced production, expanded markets, and others. All research choices tend to involve trade-offs. Sometimes human resource objectives will have to be "traded out," but it is important that they be understood and enunciated so that informed judgements can be made.

An additional item in the agenda of needed agricultural employment research relates to the need to better understand and plan for changes in the supply and demand for labor in agricultural production. The number of workers employed in agriculture is influenced by both the needs of employers and the alternatives faced by existing and potential farmworkers. Employers' need for labor is derived from the characteristics of the product

market. USDA should sponsor empirical research on labor intensive product markets oriented to an analysis of the implications for employment levels. USDA and DOL should sponsor research to explore the basic economic relationships influencing the number of workers willing to work in agriculture and the number of workers desired by agricultural employers.

One of the most significant current influences on the hired agricultural labor market is that of illegal entrants and refugees. Little has been said about them in this report not because they are unimportant but because so little is known. The issues surrounding illegal entrant and refugee policy are complex and thorny; they have significant impact on agriculture, but their ramifications are far broader. This topic should be the subject of thorough review and analysis.

2. The USDA, DOL, and other agencies should coordinate their programs related to agricultural labor to provide a sound basis for interagency cooperation at all levels. Specifically, the USDA should direct and encourage the establishment of state-level collaborative agricultural labor councils under the sponsorship of the Land Grant Universities. These councils should consist of representatives from the agricultural industry, farmworker organizations, DOL programs (especially CETA and the Employment Service), educational agencies, and others as appropriate. Their purpose would be to identify state and regional issues which impact on the industry and to recommend solutions through the development of initiatives which lead to stabilization of the agricultural labor force and improvement in the work environment for farmworkers. Moreover, these committees should help link together various training resources with priority agricultural labor needs and opportunities.

- 3. The USDA rural development programs should, in areas having major seasonal farmworker populations, have as one objective the stabilizing of employment for agricultural workers. Models for effectively accomplishing this should be identified and documented through research and demonstration.
- 4. The Secretary of Agriculture should conduct a thorough review of the Farmers Home Administration in such areas as farmworker housing programs to ascertain its effectiveness and what changes should be made to make it more effective. There is some indication that current regulations do not place resources of this program in the hands of those able and willing to build farmworker housing, while there is a scarcity of agents able to undertake such projects under current criteria.
- 5. The USDA should investigate with the DOL the possibilities for expanding both the objectives and the basic grant period of the CETA "303" program operators, so as to permit them to engage in long term planning and developmental activities essential to promote more viable agricultural careers for farmworkers. These programs should be encouraged to devote more effort to dealing with the structural changes necessary to improve agricultural employment, which will entail modifying the ways in which their performance is evaluated. These programs have most of the funds directed to training of farmworkers, and therefore are and should be playing a major role in preparing workers to move into higher quality jobs in agriculture. However, set up as they are under relatively short-term mandates and evaluation criteria, it is difficult for them to devote necessary time and resources to developing long term programs with industry and with other organizations that will help open up new opportunities for disadvantaged farmworkers. Most such impediments are a matter of regulation rather than legislation, and hence are within the power of DOL to reduce or eliminate.