



Response to CSU Extension's Labor Survey for Employers

April 14, 2021

Colorado State University (CSU) Extension's recent presentation of preliminary findings from the 2020 Colorado Agricultural Labor Survey for Employers raises concerns about the role that CSU's College of Agricultural Sciences and Extension Division continues to play in the Colorado agricultural industry. Specifically, we are concerned that the research being produced and published is intended to and has the effect of maintaining long standing power imbalances in the agricultural sector in favor of industry profits over sustainability, resilience, and ethics. While there is broader cause for concern, this public letter specifically critiques a recent report referred to as the "2020 Colorado Agricultural Labor Survey,"¹ challenges the data presented, and reveals the harms that flow from the dissemination of this research. The timing of the dissemination of the survey results raises serious concern as Senate Bill SB21-087 is being debated in the Colorado Legislature, which seeks to create protections for agriculture workers in Colorado. This letter offers reasons to be cautious of using these results for such policy decisions based on the obscurity of the methodology and imprecise data presented.

The Research

In this section we lay out the ways in which the study design and methods are obscured and the concerns this has raised. In research, one should have a stated problem or puzzle that the study seeks to answer. Only after the research objective is defined can researchers then select from the inventory of research designs for one that is best suited to achieve valid, precise, and accurate results. After this step researchers plan their methods, including the data collection technique. The survey critiqued herein appears to be an isolated instrument without the necessary prerequisites because these previous steps were not presented with transparency.

The criticisms are offered largely because the methods of the survey are so obscured (explained below). The sampling method drastically limits the researchers' ability to claim conclusive findings and the data collection instrument does not clearly lay out what it is designed to measure and frequently demonstrates a mismatch between the question and metric. If these criticisms turn out to be false with all methods revealed, this will not invalidate this critique. Rather, it further highlights the obscurity of the methods used, which is problematic because it does not follow precise and academic standards of

¹ Hill, A. (2021). *Findings from the 2020 Colorado Agricultural Labor Survey*. 2021 Colorado Fruit and Vegetable Growers Association Annual Meeting, Presented February 17, 2021.
<https://outreachmm.com/wp-content/uploads/2021/03/Hill-Slides.pdf>



research and rests findings on the assumed authority of CSU's College of Agricultural Sciences and Extension Division.

Sampling

Cited and introduced multiple times as the "2020 Colorado Agricultural Labor Survey,"² this shorthand creates a false framing for the research, implying that it is revealing critical information relevant to the wages, working conditions, and attitudes of agricultural labor.³ However, the study's authors did not survey members of the agricultural labor force; instead they collected and analyzed data exclusively from "agricultural businesses in Colorado employing at least one person." Through sampling, this survey continues to systematically and institutionally center the perspectives of employers as the authority on issues of labor—all while disregarding a large and highly experienced stakeholder group, estimated at 36,733 hired workers alone.⁴ Even if this was unintentional, this exclusion, coupled with the survey's purpose to provide a "comprehensive survey intended to answer key questions, create educational programs and resources, inform influencers and decision makers regarding the ag labor conditions in Colorado"⁵ reinforces the continuation of traditional power structures.

Beyond criticisms of the survey's target respondents, the method used to sample agricultural business owners was *convenience sampling*. The survey was promoted via "email and social media platforms with the aid of partner organizations" and administered over the Internet. This methodology limits the responses to those agricultural employers made aware of the survey, those with the time to complete the questions, and those with the desire or ability to share their opinions. As evidence of one particular issue, the 2017 Census of Agriculture reports that not all farms in Colorado have Internet access, showing how just one part of this sampling method filters initially by rendering those producers without Internet access unable to contribute. In effect, this schema removes stakeholders from this important discussion.

Further, the research team chose to narrow the sample to "Colorado farms and ranches with at least \$25,000 in annual sales" resulting in 83 participants (23%) being removed from the sample.⁶ The

² (Hill, 2021)

³ Card, A. (2021, March 9). Adrian Card: Amid the challenges, hopeful spots for agriculture. *Daily Camera*.
<https://www.dailycamera.com/2021/03/09/adrian-card-amid-the-challenges-hopeful-spots-for-agriculture/>

⁴ This number from the USDA 2017 Census, also cited on CSU's website, only represents hired labor on Colorado farms and does not include contracted workers, undocumented workers, prison workers, and others.

⁵ Colorado State University Food Systems (n.d.) *AGRICULTURAL LABOR: Research, outreach and engagement to understand Colorado agricultural labor and find solutions*. Colorado State University.
<https://foodsystems.colostate.edu/research-impacts/agricultural-labor/>

⁶ Hill, A., and Card, A. (2021). *Preliminary Findings from the 2020 Colorado Agricultural Labor Survey for Employers*. Colorado State University Extension.

<https://foodsystems.colostate.edu/wp-content/uploads/2020/06/Preliminary-Findings.Colo-Ag-Labor-Survey-for-Employers.March-2021-1.pdf>



preliminary findings report does not detail why producers with under \$25,000 in annual sales were cut when the USDA's accepted definition for producers uses \$1,000 as the minimum.⁷ Without knowing why this filter was applied to the sample, we are unable to determine what effects their removal had. Moreover, issues occur beyond these effects, such as concerns about the equitable nature of this research after removing a class of respondents that provided answers and have knowledge and experience to offer.

The full consequences this sampling method has upon the results cannot be known; but the authors, extension personnel, and agriculture industry groups assert this information as precise, even though there is no real ability to replicate these results. This lack of precision is especially meaningful in the context of a global pandemic as any future studies would not be able to elucidate the variances between the results.

Data Collection Instrument

The survey used to collect data has numerous issues that bear upon validity. The title of the study implies that the information is useful for the entirety of Colorado and all producers in the state. As shown above, the sampling actually reflects agricultural employers with greater than \$25,000 in yearly sales, a fraction of the whole. Thus, what the survey purports to measure, and actually measures, are vastly different. Further, while supporting documentation describes the purpose as: Regional analysis of farm labor supply and demand; [to] Characterize challenges and opportunities for maintaining a viable farm workforce; [and to] Identify resource gaps,⁸ there is no information made available that explains how the questionnaire fulfills that purpose, nor do the researchers provide this analysis in current publications.

Some data gathered from this survey are, without a doubt, useful if presented accurately. For example, we understand that there is value in assessing employers' perception of labor supply and demand and surveying their wage practices. Insights about the impacts of labor shortages on the business and empirical evidence of worker pay rates are valuable findings to help support producers and workers in our state. However, other questions posed exclusively to agricultural employers left us wondering how these target respondents were qualified to provide answers.

For example, a set of questions asked about perceived "challenge(s) to recruiting domestic agricultural workers" and perceived "challenge(s) to retaining domestic workers" and the options were as follows:

⁷ Economic Research Service. (2021). *Farm Structure*. U.S. Dep't of Agriculture.

<https://www.ers.usda.gov/topics/farm-economy/farm-structure-and-organization/farm-structure/>

⁸ (Hill, 2021)



12. What do you perceive as the main challenge(s) to recruiting domestic workers? (check all that apply)*	13. What do you perceive as the main challenge(s) to retaining domestic workers? (check all that apply)*
<ul style="list-style-type: none"> a. Physical work is too difficult b. Pay is too low c. Too many hours d. Seasonal employment e. Outdoor work environment f. Cultural/personal differences g. Cost of living (housing, food, utilities, etc.) h. Insufficient benefits (including bonuses and health care) i. Lack of affordable or adequate housing j. Lack of qualified applicants k. General lack of interest in being farm laborers l. Current unemployment compensation is a barrier to workforce participation m. Other _____ 	<ul style="list-style-type: none"> a. Physical work is undesirable or too difficult b. Pay is too low c. Too many hours d. Seasonal employment e. Outdoor work environment f. Cultural/personal differences g. Cost of living h. Insufficient benefits (including bonuses and health care) i. Lack of affordable or adequate housing j. Limited opportunities for advancement k. Workers leave for opportunities at other farms l. Workers leave for opportunities at non-farm jobs m. Workers leave to start their own farm n. Workers leave to attend school o. Workers leave for spouse/partner/family reasons p. Current unemployment compensation is a barrier to workforce participation q. Other _____

The design raises questions about how this list was generated and the choice of data collection tool design. The rationale used to create the list of answers, both the order and the items, was not made available. Without an explanation of why or how these options became established, we are left wondering whose worldview is represented and whose is not. Tellingly, the answer options omit matters of well-established concern to agricultural workers, including exposure to pesticides and other agri-chemicals, workplace safety on other on-the-job risks, and high incidence of sexual and sexist harassment and abuse. Fixed choice questions using nominal data need to be rigorously vetted to produce any valuable insights. The answers offered in the option list are not mutually exclusive, thus raising questions about the vetting process. For example, “outdoor work environment” or “physical work is too difficult” could be seen also as a “general lack of interest in being farm laborers.” When authoring



close-ended questions that will be administered without an interviewer present, the researchers have no control over how questions are interpreted. This leads to small variances between similar answers with unclear differentiation. The researchers also neglected to include “unsure” or “I don’t know,” forcing respondents to choose from the list without these options. Thus, some respondents likely chose options that less accurately represented their position, or made guesses for their answer.

The answers provided for questions 12 and 13 were framed as external push factors with no option for further explanation. For instance, “pay is too low” and “too many hours” were available and chosen, but the survey did not allow respondents to attribute these reasons to their own business needs or those demands created by the economy.⁹ Simply speaking, there was no option for producers to respond with systemic problems in their own human resource practices. Further, options K-O in question 13 do not present all reasons a worker may leave a job (*e.g.* being fired). This homogeneity of options allows the employer to ignore their role in the labor process. Not only do these trends significantly reinforce traditional avenues of power, they also misrepresent the reality producers face as a whole. Omission of a comprehensive list of answers forces participants to choose others that may not best represent their experiences. This inherently cannot present a complete picture of the challenges that surround employment in this industry.

Yet another concern is that the answers presented direct the respondent to make judgment about what others are experiencing. The answers “general lack of interest in being farm laborers” or “physical work is too difficult” are, at best, hearsay because they ask the employer to make assertions about motivations they do not experience. At worst, these are internal perceptions of an employer that demonstrate their world view as shaped by the perspective of a business owner and does not represent reality in the workforce in any way. In all cases, this is an etic perspective¹⁰ that is not able to be analyzed without the respective emic perspectives¹¹ of workers. For example, “Current unemployment compensation is a barrier to workforce participation” (option L on question 12 and option P on question 13) brings up the notion that some folks won’t come to work because the pay from their unemployment checks is higher than what they would be offered in the farm or ranch. Not only do employers lack the credibility to empirically claim this, there is also little data to support such a statement. In fact, a recent study proved the opposite.¹² This perception-based result would only provide data demonstrating that this is a concern shared by employers, not evidence to prove it is happening. The resulting employer-perception data alone can not be used in action-oriented or applied work and it is dangerous to make both private business and public policy decisions based on the collected assumptions of agricultural employers.

⁹ The agricultural employers’ perceptions about their ability to increase wages to attract or retain labor was posed in a separate question. The answer options for this question also poses issues of leading the respondents.

¹⁰ Etic view is the perspective and understanding of an outsider looking in on a phenomena or cultural experience.

¹¹ Emic view is the insider’s perspective and understanding of their own lives, community, culture and experiences. The emic view is a qualitative ethnographic method designed to include those who are usually excluded from studies.

¹² Faberman, J. and Ismail, A. H. (2020, June) How Do Unemployment Benefits Relate to Job Search Behavior?. *Chicago Fed Letter*, No. 441. <https://www.chicagofed.org/publications/chicago-fed-letter/2020/441>



Additionally, the question format heavily affects the resulting data. A “check all that apply” question is an ineffective way to go about generating data to be used in consensus analysis (if the purpose is to later compare emic and etic perspective). While we have detailed the problems with the provided option list above, perhaps these options were exactly what the researchers intended on assessing. In order to effectively compare etic and emic perspectives on these answers, there are other questions formats that would produce data more useful for concrete analysis. For example, if the researchers wanted to assess the impact of “Insufficient benefits (including bonuses and health care)” on recruitment or retention, a Likert scale question should be administered to both workers and employers, then the results compared. Using these data in a ranked-ordered question would provide direct comparisons to related emic data (if it were to become available).

In total, this data collection instrument results in data that can be used but is an example of exclusionary framing which limits its accuracy and applicability for purposes of setting public policies.

Another question reveals the potential political motivations behind the study by asking, “What policy solutions do you think would be most effective for addressing challenges faced by workers at your agricultural business?” Employers are first asked to make judgement calls about challenges they do not face and then to propose policy solutions to those challenges. This question also has methodological issues as answers are left up to interpretation. “Challenges faced by workers at your agricultural business” was not defined elsewhere in the survey and cannot be assumed to be captured in question about retention as the terminology is different. Again, we are presented with the question of how this list of answers was generated—a list which omits most solutions presented in Colorado SB 21-087,¹³ A Bill for An Act Concerning Agricultural Workers’ Rights, which was introduced by a coalition of agricultural worker advocates in 2021, during the 73rd Colorado General Assembly.

Finally, the inclusion of question 30, “In your experience, in the first year an H-2A worker is employed on your farm are they more or less productive than your domestic workers?,” and question 31 asking about the increase or decrease of productivity of H-2A workers, reveals something about the researchers’ focus. As the only question in the survey that aims at the value of workers, it reduces evaluation to the single factor of “productivity.” Without further insight about the ways employers measure productivity, or a more holistic evaluation of employees, this question can not be compared to worker-produced data, if it were to become available. While productivity of workers is one among several characteristics of a valuable employee, it should not be the sole consideration—even from an employer perspective. There are a whole range of qualities that employers might care about, such as honesty, reliability, work ethic, skill, attentiveness to food safety, or orientation toward collaboration over competition with coworkers, to name a few.

¹³ A Bill for an Act Concerning Agricultural Workers’ Rights, S.B. 21-087, 73rd General Assembly, 2021 Reg. Sess. (Colo. 2021), <https://leg.colorado.gov/bills/sb21-087>



The overarching problem is that the publications (both the preliminary findings and the presentation) do not offer an analysis and interpretation of the data. Much of the data are qualitative and subjective perceptions, but are presented quantitatively as if they speak by themselves. The researchers should offer their skill in analyzing these results, their strengths and limitations, and then, based on how these results relate to the overall design, offer some interpretation, conclusions and recommendations. Publishing these results without the accompanying analysis is, in effect, hiding behind "preliminary findings."

Discussion

Centering employers' perspectives on labor issues reifies long held imbalances in both power and esteem. Supplying multiple choice answer options that suggest people "lack interest" or find the work is "too difficult" invites employers to disparage workers. These answer options, which were the top selected responses by survey participants regarding recruiting challenges,¹⁴ demonstrate exactly why presenting this narrative without companion data from worker perspectives maintains a historic narrative about lazy and ungrateful workers, over 65% of which in Colorado are People of Color.

FrontLine Farming met with CSU Assistant Professor, Alexandra Hill, and CSU Extension Agent, Adrian Card, on March 10, 2021 to discuss concerns about the methodology of this project. We explicitly inquired about the value of agricultural employer perceptions in the absence of companion worker-perception data. The researchers explained that they felt any perspective on an issue carries some value and with mounting interest in agricultural workers as essential workers, they felt this was a timely study. Still, the researchers never clearly stated the objectives and goals of the study, either in the meeting or the preliminary report. They further shared that, in the long term, they aim to run a similar survey with agricultural laborers as the respondents, but had limited funding and knew there were greater barriers to accessing workers that prevented that work from being completed.¹⁵

As researchers ourselves, we are familiar with various methodologies, especially phenomenological ones that set out to garner perceptions and experiences within a community. Among the methodologies we know of, this study is most comparable to the Perception Study or Dual-Perspective Study, which is the "conscious and systematic process of perceiving, understanding, and comparing simultaneously the

¹⁴ (Hill, 2021, p. 16)

¹⁵ We understand that this research was funded by the Western Extension Risk Management Education Center, a USDA NIFA Extension Risk Management Education Center that partners with state university Extension educators and public and private sector partners in the western United States for the express purpose of "support[ing] producers in establishing long-term risk management strategies that will strengthen the economic viability of their farm and ranch enterprises." While this is an important objective, it goes a long way toward explaining why a study about agricultural labor did not endeavor to engage any agricultural laborers. It additionally limits the policy relevance of the data.



values, attitudes, and behavior of the larger societal system with those of the [...] community system.”¹⁶ In these methodologies, data credibility is established by collecting corresponding data in a single research phase, not segregating data collection by perspectives. The CSU researchers made an affirmative choice to publish results of a study before all stakeholder groups were surveyed, again placing value on employer perspectives as stand-alone findings.

All too often, researchers shy away from engaging agricultural laborers because they believe this population to be too difficult to reach. This perception only serves to confirm the degree to which many members of the agricultural workforce are marginalized and socially isolated from other stakeholders in the food system and in civil society. However, at the time this study was conducted, the Project Protect Promotora Network (PPPN) was already active. Had the researchers wanted to connect with workers, the PPPN would have happily facilitated access and assisted with survey design, translation, and dissemination to worker communities in our four Colorado workforce regions. While the researchers may have faced hurdles to community access and engagement, they did not put in the effort to ensure equitable generation and elevation of community data. It is also telling that the faculty and staff of CSU's College of Agriculture and Extension Division—a group of people who have been commonly regarded as the statewide experts on agriculture for over a century—do not believe themselves to be well positioned to access or engage the labor force in the sector they study.

The dearth of data on agricultural workers in Colorado is more pronounced than data gaps regarding the experiences, perceptions, and needs of employers. For example, the USDA census collects information about labor and expenses from employers, the Colorado Department of Labor and Employment and the Quarterly Census of Employment and Wages both present data on pay rates within the industry. These data sets can be disaggregated for Colorado at both the state and county levels. H-2A application data sets are the most detailed data sets for workers, but are still from the employer's perspective and no worker voices are represented in those data sets either. The National Agricultural Workers Survey (NAWS) does not provide publicly accessible disaggregated data by State, and moreover the Colorado sample within this is a minute fraction of the total population of over 40,000 workers in Colorado. The largest gap remains the lack of data representing workers, not their employers.

The choice to start this research with agricultural employers—and to publish it at a point when only employers had been surveyed—evinces disregard at best. Publishing an analysis of data from only part of the intended sample has the potential to generate inconclusive or even misleading results because the analysis is typically underpowered or a subsample is often nonrepresentative. While the researchers did label their publication as “preliminary,” they offered no indication of what further work was to be conducted and did not disclose the limitations of their methodology. In this context, the term “preliminary” can only be read as a premature analysis of the data, not as a partial publication. We

¹⁶ Norton, D. (1978). *The Dual Perspective: Inclusion of Ethnic Minority Content in the Social Work Curriculum*. Council on Social Work Education, Inc.; New York, N.Y.



believe that this fits the researchers' intentions because they were unable to confirm whether or when they planned to carry out the companion survey of workers that their own chosen methodology requires.

While the researchers may have desired to publish and share findings with stakeholders in a timely manner, speedy publication should not trump complete execution of a methodology and should not happen at the expense of rigorous analysis. We cannot imagine that the CSU researchers would disagree with this assertion. And yet, the rushed timing of this publication indicates that their actions may have strayed from these basic research ethics for politically motivated reasons. The researchers chose to publish "preliminary findings" just before historic state legislation was introduced in the Colorado Senate¹⁷ that would elevate and correct the long-standing injustices Colorado's agricultural workers face. The position of CSU's College of Agricultural Sciences and Extension Division as an academic leader in the field gives the 2020 Colorado Agricultural Labor Survey for Employers, and the data contained therein, considerable weight and power—significance that may not be warranted given the flaws in research design and execution.

To guard against mischaracterization, we must conclude by clearly stating that the critique of the design, execution, framing, and timing of the so-called "2020 Colorado Agricultural Labor Survey" set forth above is just that, a critique of a specific piece of research. We are not arguing that the experiences, perceptions, and perspectives of agricultural employers are not worthy of study or of consideration in the policy process. Rather, we take issue with the fact that this flawed study—which has been positioned as the first "comprehensive Colorado ag labor survey" performed in decades¹⁸—presents the opinions of agricultural employers without attempting to derive the basis for those opinions, while also positioning employers to substitute their assumptions for the lived experiences and direct knowledge of workers. The researchers created a platform for agricultural employers to elevate their opinions to academic discourse without also creating a pathway for workers to supply information about matters that they experience firsthand. When researchers affiliated with CSU's College of Agricultural Sciences and Extension Division conduct themselves as described herein, they actively maintain the imbalance of data in favor of business owners at the expense of worker experiences.

Sincerely,

¹⁷ A Bill for An Act Concerning Agricultural Workers' Rights, S.B. 21-087, 73rd General Assembly, 2021 Reg. Sess. (Colo. 2021), <https://leg.colorado.gov/bills/sb21-087>

¹⁸ Colorado Livestock Association. (2020, Dec. 7). *Colorado agricultural labor survey for employers*. Morning Ag Clips. <https://www.morningagclips.com/colorado-agricultural-labor-survey-for-employers/>; Colorado Livestock Association. (2020). *Colorado Agricultural Labor Survey for Employers*. Colorado Livestock Association. <https://coloradolivestock.org/colorado-agricultural-labor-survey-for-employers-2/>; Lincoln County Colorado Extension. (2021, Jan. 27) Facebook.com public post. <https://www.facebook.com/LincolnCountyColoradoExtension/posts/3286909664749029>



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