



The Honorable Russell T. Vought
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

May 13, 2026

RE: 2026-07058 (91 FR 18882) Agency Information Collection Activities;
Submission for OMB Review; Report on Occupational Employment and Wages

Via Electronic Submission to www.reginfo.gov

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Director Vought:

On behalf of AmericanHort, thank you for the opportunity to provide feedback on the Occupational Employment and Wage Statistics (OEWS). This data collection, conducted by the Department of Labor (DOL) Bureau of Labor Statistics (BLS), is critically important to agricultural employment.

AmericanHort is the leading national trade association for the horticulture industry, representing 20,000 members and their affiliated businesses across the country. Our diverse membership includes greenhouse and nursery growers, breeders, garden retailers, interior and exterior landscape professionals, florists, educators, and suppliers. Collectively, our industry generates over \$500 billion in annual economic impact and supports approximately three million U.S. jobs, which depend on sound public policy and strong collaboration with federal leaders.

The OEWS data is critically important to the administration of the H-2A Temporary Agricultural Worker Program and provides essential wage stability for horticulture employers that rely on seasonal labor. On October 2, 2025, the U.S. Department of Labor issued an interim final rule updating the methodology for H-2A Adverse Effect Wage Rates (AEWRs) to use the May OEWS release. Previously, AEWRs were based on the U.S. Department of Agriculture's Farm Labor Survey (FLS), which was discontinued in August 2025.

For the horticulture industry – including greenhouse, nursery, landscape, and specialty crop operations, the updated methodology is expected to reduce labor cost pressures while maintaining a transparent and reliable wage-setting process. The Department estimates the change will save U.S. agricultural employers more than \$1.5 billion in labor costs. Regionally, employers in Kentucky and Tennessee are projected to save \$1.48 per hour, while employers in Kansas and Nebraska could see savings of \$1.70 per hour. Florida employers, many of whom operate labor-intensive nursery and ornamental production businesses, are expected to save \$1.84 per hour.

Any disruption or elimination of OEWS data releases would create significant uncertainty for horticulture employers participating in the H-2A program and leave policymakers with few viable alternatives for establishing fair, data-driven wage rates.

Ensuring that OEWS wages are a true reflection of hourly pay for agricultural workers is critical to maintaining the H-2A program as a reliable, workable program for American agricultural employers. While the OEWS is a significant realignment to the realities in farm country, the OEWS could adjust maintain future reliability and predictability.

Currently, only farm labor contractors (FLCs) are included in the data collection for agricultural-specific occupations. These employers fill different roles in agricultural communities across the country, skewing how their inclusion affects wages in different states and omitting the majority of agricultural employers. In the interim final rule for AEWRs, the Department committed to including direct farm employers in future surveys. We encourage BLS to follow through on this expansion to ensure the data includes a true representation of all agricultural employment.

However, including direct farm employment in OEWS data collection will require adjustments that recognize the operational realities of agricultural and horticultural employers. Unlike many industries, farms, nurseries, greenhouses, and landscape operations often lack large administrative staff dedicated to payroll reporting or compliance. Many horticulture businesses are family-owned or seasonal operations that manage records with limited personnel and, in some cases, still rely on paper-based systems that require additional time and resources to transfer into survey reporting platforms.

Because agricultural employers have historically worked with the U.S. Department of Agriculture (USDA) on labor and wage data collection, we encourage the Bureau of Labor Statistics (BLS) to collaborate closely with USDA and industry stakeholders to ensure survey methodologies and reporting requirements are practical, accessible, and responsive to the needs of direct farm and horticultural employers.

Agricultural and horticultural employers also commonly use a variety of compensation structures to recognize worker efficiency, productivity, and specialized skills. These may include production-based incentive pay, end-of-season bonuses, piece-rate supplements, or other performance-related earnings in addition to a worker's base hourly wage. While the OEWS methodology generally excludes certain forms of supplemental compensation, including overtime and non-production bonuses, the inclusion of production-based incentive pay can unintentionally overstate reported base wage rates.

Because OEWS data now plays a central role in establishing wage floors for the H-2A program, any methodology that artificially inflates base hourly wages can have significant consequences for horticulture employers by rapidly increasing labor costs in an already labor-intensive industry. This is particularly impactful for greenhouse, nursery, and specialty crop operations that depend heavily on seasonal labor and frequently use incentive-based pay to reward productivity.

To improve the accuracy, reliability, and credibility of OEWS estimates, we recommend that the Bureau of Labor Statistics (BLS) refine its methodology to ensure only true base hourly wages are included in wage calculations, excluding production-based bonuses and incentive compensation. Doing so would strengthen OEWS as a transparent and dependable wage-setting tool for the Department of Labor's H-2A program.

AmericanHort supports the continuation of the OEWS program and recognizes its increasingly important role in the administration of the H-2A program. For horticulture employers, OEWS is more than a statistical resource. It is now a foundational policy tool that directly impacts labor costs, workforce stability, and the long-term viability of labor-intensive agricultural operations.

As OEWS assumes this expanded role in H-2A wage determination, it is essential that the methodology remains accurate, transparent, and reflective of real-world agricultural employment practices. Thoughtful adjustments to survey design and wage calculations will help ensure OEWS continues to provide reliable and predictable data for employers, policymakers, and federal agencies while supporting a stable and competitive U.S. horticulture industry.

Thank you again for the opportunity to provide comments on this important issue. AmericanHort looks forward to continued collaboration with the Bureau of Labor Statistics, the Department of Labor, USDA, and other stakeholders to develop a data collection and wage-setting model that is practical, accurate, and truly works for the agricultural and horticultural industries.

Sincerely,

A handwritten signature in black ink that reads "Matthew D. Mika". The signature is written in a cursive, flowing style.

Matthew D. Mika
Vice President, Advocacy and Government Affairs
AmericanHort