

From: Regulations.gov Help Desk [mailto:regulations@erulemakinghelpdesk.com]
Sent: Tuesday, March 17, 2015 3:49 PM
To: Mark Freedman
Subject: Comment received on Migrant Grants Notice

Attached is a comment received on March 17, 2015, by Regulations.gov on the Federal Register notice entitled Migrant Grants: Agricultural Worker Population Data for Basic Field.

Public Comments on Migrant Grants: Agricultural Worker Population Data for Basic Field:=====

Title: Migrant Grants: Agricultural Worker Population Data for Basic Field
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Comment:

After further examination of the the Legal Services Corporation (LSV) proposal to (1) use the new data for grants beginning in January 2016, (2) phase in the funding changes to provide intermediate funding halfway between the old and new levels for 2016 and to fully implement the new levels for 2017, and (3) update the data every three years on the same cycle as LSC updates poverty population data from the U.S. Census Bureau for the distribution of LSC's Basic Field General grants, my position is that the LSC will effectively and efficiently fund civil legal aid services to address the legal needs of agricultural workers and their dependents. Living in an area in California surrounded not only by acres of agricultural crops and vineyards, but also a multitude of Migrant Field Workers has helped me to personally see first hand how much these people struggle financially. Having had the opportunity to work on a strawberry field for the summer, I was also able to experience the physical hardship that these people face on a day to day basis as well as their financial setbacks because of the pay that they receive. After reviewing the data set that JBS International, the Employment and Training Administration's (ETA) contractor for population estimates, published on January 19, 2015 it is clear that California has over 5 times the amount of workers in fields than any other state. Of those 633,978 estimated workers in the data set, only 323,521 meet the eligible requirements LSC issues for these population based grants for migrant workers. With no professional knowledge in mathematics needed, it is clear to see that there is 310,457 workers that were not eligible. Taking the information from these estimates JBS International provides, the grant will only aid those workers that are eligible. Many factors can contribute to the reason there is more than half of the workers that are not eligible, but they will still not be provided any funds which is where they become effected. I believe that it is crucial that both the eligible and ineligible receive grants because both are people that contribute to the economy in vast numbers although some most may be undocumented. Coming from a family with agricultural background, this rule would impact my family and I because a multitude of my relatives work in the fields and I personally have experienced the financial problems that they face especially with the drawback the economy had impacted us in December of 2007 with the Great Recession in the U. S. subprime mortgage crisis and financial crisis.