

June 14, 2019



Ms. Nancy Potok
Chief Statistician
Office of Management and Budget
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, N.W.
Washington, D.C. 20503

ID: OMB-2019-0002-0001

Dear Ms. Potok:

The Association of Farmworker Opportunity Programs (AFOP) is pleased to provide this letter in response to the Office of Management and Budget's (OMB) call for public comment on how differences among the federal government's consumer price indexes might influence the Official Poverty Measure (OPM). AFOP urges OMB to give this letter careful consideration as the agency deliberates this important question.

On May 7, 2019, OMB issued a request for comment on a potential change to how the federal government measures poverty in the United States. Under the OPM, the poverty thresholds are calculated by the United States Census Bureau and updated each year to account for inflation. While the OPM is primarily used for statistical purposes, the United States Department of Health and Human Services (HHS) bases its annually issued poverty guidelines on the OPM thresholds. The poverty guidelines are in turn used to determine eligibility for a wide range of government programs, including the National Farmworker Jobs Program (NFJP) (Public Law 113-128, Section 167).

HHS poverty guidelines for 2019 are \$25,750 for a family of four, and many experts contend these guidelines are far too low and do not capture the true financial struggles of millions of Americans, including the nation's 2.5 million farmworkers, who live below the current poverty line or just above it. Many of these farmworkers and their families rely on NFJP and other would-be affected programs to survive. Regrettably, instead of ensuring the OPM more fully captures the financial hardships of low-income Americans and helping programs better serve them, OMB is apparently looking for ways to shrink the services these individuals can access.

According to the May 7 Request for Comment, it appears OMB would like to change the inflation measure used to set the OPM each year from the Consumer Price Index for All Urban Consumers (CPI-U) to the Chained Consumer Price Index for All Urban Consumers (C-CPI-U or "chained CPI"). Making this change while addressing none of the ways in which the current poverty line underestimates hardship could decrease the accuracy of the OPM. Further, because chained CPI shows slower inflation over time, fewer individuals would fall below the poverty line in the future, and programs that serve low- and moderate-income people would see major funding cuts. OMB itself acknowledges this when it says, "[C]hanges to the poverty thresholds, including how they are updated for inflation over time, may affect eligibility for programs that use the poverty guidelines."

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Congress has repeatedly enacted program eligibility standards based on the HHS guidelines, always assuming these guidelines would continue to be updated using the current methodology. It would be therefore wrong for OMB to unilaterally lower the guidelines and, in doing so, decrease eligibility for vital programs that sustain the poor in America.

Farmworkers are the poorest of the poor, the most vulnerable in society. They break their backs to feed the nation, but most Americans do not recognize, or even consider, how critical they and their work are to the nation and the economy. Farmworkers and their families rely on the highly successful NFJP for the life-changing training and housing services that allow them to break the cycle of intergenerational poverty. Congress intended for them to have access to these services. Why would this government seek to limit that access? It makes no sense. OMB should reject this change.

AFOP thanks OMB for its consideration of these comments.

Respectfully,



Daniel Sheehan
Executive Director