Agricultural and Seasonal Workers

When Work Follows the Harvest, Not the Calendar

Elena's Story

Elena picks lettuce in Yuma, Arizona from November through March, working sixty-hour weeks in the winter sun. She rises before dawn, boards the crew bus at 5:30 AM, and spends eight to ten hours bent over rows of romaine under cloudless desert skies. The work is hard, the pay is hourly, and during peak harvest she logs 240 hours monthly, three times the 80-hour threshold Medicaid work requirements demand.

When the Yuma season ends in late March, Elena follows the crops north. The Salinas Valley in California needs workers by late April, but the gap between seasons leaves her with no documented work hours for most of April and all of May. She uses this time to visit family in Mexicali, repair equipment, and rest muscles that ache from months of stooping. By June she's back in the fields, working another harvest that will carry her through October.

Elena will work approximately 1,400 hours this year, far exceeding the 960 annual hours that would satisfy work requirements if calculated on a yearly basis. She is never unemployed by choice. She works every hour the agricultural calendar offers. But monthly verification will flag her as non-compliant in April, May, and possibly November when she transitions between growing regions. She'll fail verification in four separate months while exceeding annual requirements by nearly fifty percent.

This pattern affects approximately 2.4 million farmworkers and their families across America's agricultural regions. The fundamental mismatch between monthly work requirements and seasonal employment patterns creates systematic coverage loss among workers whose labor feeds the nation. The policy question is whether states will accommodate agricultural employment as it actually exists or systematically exclude workers whose industries don't operate on monthly cycles.

The Agricultural Workforce in Medicaid Expansion

Agricultural workers represent a significant and distinctive segment of the Medicaid expansion population. Estimates of the total U.S. farmworker population range from ***2 to 3 million workers,*** with seasonal and migratory patterns that complicate precise counting. Average annual employment in agriculture runs approximately 1.3 million full-time equivalent positions, but the number of unique individuals working in agriculture is substantially higher due to the seasonal nature of the work and high turnover rates.

The demographic profile overlaps extensively with Medicaid expansion eligibility. According to the National Agricultural Workers Survey, approximately 21 percent of farmworkers live in poverty, with median annual income between $20,000 and $24,999. These income levels fall well within Medicaid expansion thresholds in most states. Approximately 77 percent of farmworkers identify as Hispanic, with 63 percent born in Mexico. About two-thirds are citizens or legal permanent residents eligible for public benefits.

Geographic concentration creates regional policy significance. California's Central Valley employs the largest concentration of agricultural workers, with the state accounting for roughly 40

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percent of national hired farm labor. Florida's agricultural regions, the Texas Rio Grande Valley, Arizona's Yuma County, Washington's Yakima Valley, and North Carolina's coastal plains represent other major employment centers. In these regions, agricultural workers constitute substantial portions of the Medicaid expansion population, making policy design for seasonal employment patterns regionally critical.

The intersection with limited English proficiency compounds administrative challenges. Approximately 30 percent of farmworkers speak English "not at all," and another 25 percent speak it "a little." Verification systems designed around English-language portals, English-language telephone assistance, and English-language documentation create compounding barriers for populations already facing seasonal employment challenges.

Health needs in this population are substantial and often occupation related. Farmworkers face elevated rates of occupational injuries, pesticide exposure, musculoskeletal disorders from repetitive motion, and heat-related illness. They experience significant health disparities including diabetes, malnutrition, infectious diseases, and depression. The isolation inherent in following crops makes establishing relationships with healthcare providers difficult and maintaining treatment regimens challenging. Coverage loss during off-seasons eliminates access precisely when workers have time to address health needs.

Seasonal Employment Patterns

Agricultural employment follows crop calendars that vary by region, commodity, and climate. Understanding these patterns reveals why monthly work requirements create structural compliance impossibility for workers whose employment is fundamentally seasonal.

The harvest surge defines agricultural work rhythms. ***During peak seasons, agricultural workers commonly log sixty to eighty hours weekly for eight to sixteen consecutive weeks.*** Elena's 240-hour months during Yuma lettuce harvest are typical for workers in labor-intensive crops. Fruit picking, vegetable harvest, and processing operations demand intensive labor during narrow windows when crops must be harvested before spoilage. Workers who can access these hours have strong economic incentive to maximize earnings during available weeks.

The off-season reality involves zero documented hours for extended periods. When crops aren't growing, agricultural employment doesn't exist in most regions. Workers either find non-agricultural employment, pursue alternative activities, or wait for the next season. The waiting period isn't idleness; workers repair equipment, address deferred health needs, and attend to family obligations impossible during harvest intensity. But verification systems counting only documented work hours cannot capture this reality.

Following the crops once represented the dominant pattern for migratory agricultural workers. Workers would follow harvest seasons northward through the year: winter vegetables in Arizona and Florida, spring planting and summer harvest through California and the Pacific Northwest, fall harvest in the northern states. This migration pattern could theoretically produce year-round employment, but transitions between regions create documentation gaps and the follow-the-crop lifestyle has declined significantly. According to USDA research, only about 4 percent of farmworkers now participate in multi-state seasonal migration, down from 14 percent in the 1990s.

Regional crop calendars create predictable employment patterns that verification systems could accommodate if designed appropriately. Yuma lettuce runs November through March.

Salinas Valley vegetables peak May through October. California citrus harvest spans November through May. Florida strawberries concentrate December through March. Georgia peaches peak June through August. These patterns are well-documented and stable year to year. The seasonal variation isn't unpredictable; it's entirely foreseeable.

The multi-employer reality complicates verification even during work seasons. Agricultural workers frequently work for multiple employers within a single season, moving between farms as different crops reach harvest. A worker might pick strawberries for one grower in week one, move to another grower's blueberry operation in week two, and return to the first grower for a different crop in week three. Aggregating hours across employers requires verification from each, multiplying documentation burden during already-intensive work periods.

Verification System Failures

Monthly work requirements designed for stable year-round employment systematically fail when applied to agricultural workers. The failures emerge from structural mismatches between policy design assumptions and agricultural employment reality.

The monthly threshold problem creates automatic non-compliance during seasonal transitions. An agricultural worker who logs 200 hours in March and zero hours in April fails April verification regardless of total annual hours. The policy treats each month independently, as if employment patterns reset monthly. For workers whose employment is fundamentally seasonal, this design creates inevitable failure during off-seasons that have nothing to do with work effort or availability.

Address instability undermines mail-based verification for migratory populations. Workers following crops may have different addresses in different seasons. Some live in employer-provided housing that changes with each job. Mail sent to a winter address may not reach a worker who has moved to a summer location. Verification deadlines that arrive at old addresses trigger non-compliance for workers who never received the notice.

The employer attestation challenge multiplies with agricultural employment complexity.

Agricultural employers range from large corporate operations with sophisticated HR systems to small family farms with no administrative infrastructure. Farm labor contractors intermediate between workers and growers, creating questions about which entity should provide verification. Many agricultural employers resist providing documentation due to immigration concerns, administrative burden, or simple unfamiliarity with Medicaid processes. When employers don't respond to verification requests, workers lose coverage regardless of actual work hours.

Fear of documentation compounds verification failures. Mixed-status families, where some members are citizens or legal residents eligible for Medicaid while others lack documentation, may avoid verification processes entirely due to concerns about immigration enforcement. The "chilling effect" of immigration-related anxiety reduces participation in public programs among eligible individuals. Agricultural workers may choose coverage loss over documentation that they fear could expose family members to enforcement risk.

Language barriers create additional verification obstacles. Online portals primarily in English, telephone assistance requiring English communication, and documentation requirements assuming English literacy exclude workers whose primary language is Spanish or indigenous languages. Translation services may be theoretically available but practically inaccessible during the limited time agricultural workers have between dawn-to-dusk field work.

The Annual Averaging Solution

The most direct policy response to seasonal employment patterns is annual averaging of work hours rather than monthly verification. This approach recognizes that 960 hours annually represents the same total work as 80 hours monthly, but accommodates the uneven distribution inherent in seasonal industries.

The arithmetic is straightforward. Elena's 1,400 annual hours, concentrated in eight months of agricultural work, substantially exceeds the 960 annual threshold that 80 monthly hours would produce over twelve months. Annual averaging would recognize her compliance based on total work rather than monthly distribution. She would submit verification showing cumulative hours, with the system tracking progress toward the annual threshold rather than demanding uniform monthly achievement.

Hour banking mechanisms allow workers to accumulate credits during high-employment months that carry forward to cover low-employment months. A worker logging 200 hours in March would bank 120 excess hours beyond the 80-hour monthly threshold. Those banked hours could cover subsequent months until depleted. This approach maintains monthly verification touchpoints while accommodating seasonal variation.

SNAP provides a partial model through its treatment of migrant and seasonal farmworkers. SNAP regulations specifically address farmworker circumstances, including exemptions from work registration for workers under contract to begin work within 30 days and special provisions for determining income when employment is seasonal. While SNAP's work requirements differ from Medicaid's, the recognition that seasonal workers require distinct treatment offers precedent for accommodating agricultural employment patterns.

State policy choices within federal constraints determine whether annual averaging is available. Federal work requirement frameworks under OB3 / H.R.1establish minimum requirements but permit state flexibility in implementation. States can define compliance periods, create seasonal worker exemptions, and design verification systems that accommodate agricultural employment. The question is whether states choose to exercise this flexibility or impose monthly requirements that structurally exclude seasonal workers.

The administrative complexity of annual averaging is modest compared to monthly verification of irregular employment. Rather than chasing monthly documentation from multiple short-term agricultural employers, states could accept annual earnings records, employer attestations of seasonal employment patterns, or industry-based seasonal worker designations. Simplified verification of known seasonal patterns may actually reduce administrative burden compared to monthly verification of unpredictable hours.

H-2A and Immigration Status Complications

The H-2A temporary agricultural worker program adds distinct dimensions to work requirement analysis. H-2A workers are lawfully present in the United States but do not qualify for Medicaid because they are not considered "qualified immigrants" under federal law. This ineligibility applies regardless of state Medicaid expansion status. However, H-2A program dynamics affect the broader agricultural workforce and the communities where H-2A workers concentrate.

The H-2A program has grown substantially, quadrupling over the past decade to approximately 370,000 certified positions annually. Over 90 percent of H-2A workers are

employed on crop farms. Their presence affects labor markets, employer practices, and community health infrastructure in agricultural regions. When H-2A workers lack healthcare access, community health systems absorb uncompensated care costs. When they become ill or injured, the burden falls on emergency departments and community health centers regardless of insurance status.

Mixed-status families create coverage complexity extending beyond individual eligibility. A household might include U.S. citizen children eligible for Medicaid or CHIP, a legal permanent resident parent eligible for Medicaid expansion, and an undocumented family member ineligible for coverage. Work requirement verification for the eligible adults may require documentation that family members fear could expose the undocumented individual to enforcement. The verification process itself becomes a source of family-wide anxiety affecting participation by eligible members.

The chilling effect on verification participation is well-documented across public benefit programs. ***Following increased immigration enforcement, eligible individuals reduce participation in programs for which they qualify due to fear of consequences for themselves or family members.*** Agricultural communities with significant immigrant populations may see disproportionate coverage loss not because workers fail to meet requirements but because they avoid verification processes entirely.

Employer documentation concerns intersect with immigration enforcement anxieties. Agricultural employers asked to verify worker hours may worry that responding invites scrutiny of their broader workforce. Employers employing both documented and undocumented workers may resist any documentation process. This employer reluctance affects all agricultural workers, not just those with immigration-related concerns, as verification systems depend on employer cooperation that immigration dynamics may discourage.

State Policy Choices

States implementing work requirements for agricultural populations face explicit choices about whether to accommodate seasonal employment or systematically exclude workers whose industries don't operate on monthly cycles.

Defining "seasonal worker" for exemption purposes requires clear criteria. States might use industry-based definitions: anyone employed in agricultural occupations is subject to seasonal worker provisions. Alternatively, states might require individual demonstration of seasonal employment patterns through employer attestation or historical work records. Industry-based definitions are administratively simpler but may be over-inclusive. Individual determinations are more targeted but impose documentation burdens on workers and employers.

Seasonal exemptions create explicit policy accommodations. A state might exempt agricultural workers from work requirements during documented off-seasons, recognizing that employment simply doesn't exist during certain months. The exemption would require demonstration of agricultural employment during working seasons but would not penalize workers for seasonal unavailability of agricultural work. This approach acknowledges that off-season non-employment reflects labor market structure rather than individual work effort failure.

Reduced hour thresholds for seasonal industries recognize that agricultural employment intensity varies. Rather than demanding 80 hours monthly throughout the year, states might require 960 annual hours with no monthly minimum, or might require 80 hours during designated

agricultural seasons with exemptions during off-seasons. The threshold structure communicates whether policy accommodates agricultural reality or ignores it.

Employer attestation of seasonal patterns could simplify verification while maintaining accountability. Agricultural employers know which months involve active operations and which involve seasonal closure. A grower attestation that "this employee worked throughout our March-October growing season and our operation closes November-February" provides verification of seasonal patterns without requiring monthly documentation during months when employment doesn't exist.

Regional variation in policy implementation may be appropriate given agricultural concentration. ***States with significant agricultural employment might implement different verification procedures in agricultural counties than in urban areas.*** This geographic differentiation recognizes that one-size-fits-all policies may work poorly across diverse employment landscapes.

Elena Revisited

Annual averaging would transform Elena's compliance experience. Her 1,400 annual hours would satisfy the 960-hour threshold with substantial margin. Rather than monthly verification showing non-compliance in April, May, and November, she would demonstrate cumulative hours reaching the annual requirement by August or September. Her remaining work months would accumulate additional hours providing buffer against any unexpected employment disruptions.

The verification process would accommodate her seasonal reality. She might submit documentation once annually showing total agricultural employment, or quarterly showing cumulative progress toward annual requirements. The system would recognize that lettuce picking in Yuma and vegetable harvest in Salinas constitute the same kind of work even when performed for different employers in different states.

Her healthcare access would remain continuous through seasonal transitions. Rather than losing coverage during April and May when she visits family and prepares for the next season, she would maintain coverage throughout the year based on demonstrated annual compliance. She could address the shoulder pain accumulated from months of stooping, the skin concerns from prolonged sun exposure, and the health maintenance that intensive field work makes impossible during harvest seasons.

The policy change is straightforward. The benefit to agricultural workers doing essential labor that feeds the nation is substantial. The question is whether states recognize that monthly work requirements applied to seasonal industries create structural exclusion, and whether they exercise available flexibility to accommodate employment as it actually exists.

Next in series: Article 11R, "The Structurally Locked-Out"

Previous in series: Article 11P, "Foster Care Alumni"

References

1. U.S. Department of Agriculture Economic Research Service. "Farm Labor: Demographics and Trends." ERS Topic Page, 2024.
2. U.S. Department of Labor. "National Agricultural Workers Survey." Employment and Training Administration, 2024.
3. Bureau of Labor Statistics. "Agricultural Workers: Occupational Outlook Handbook." BLS.gov, 2024.

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4. Economic Policy Institute. "How Many Farmworkers Are Employed in the United States?" EPI Blog, 2024.
5. Rural Health Information Hub. "Migrant and Seasonal Farmworker Health Overview." RHIhub.org, 2024.
6. MHP Salud. "Farmworkers in the United States: Demographics and Health." MHPSalud.org, 2023.
7. National Center for Farmworker Health. "Facts About Agricultural Workers." NCFH.org, 2024.
8. U.S. Citizenship and Immigration Services. "H-2A Temporary Agricultural Workers." USCIS.gov, 2025.
9. Farmworker Justice. "The Affordable Care Act and H-2A Agricultural Workers: Frequently Asked Questions." Farmworker Justice Issue Brief, 2015.
10. Food and Nutrition Service. "SNAP Work Requirements." USDA FNS, 2025.
11. California Department of Social Services. "Farm Worker Rights in the CalFresh Program." CalFresh Guide, 2023.
12. Centers for Medicare & Medicaid Services. "Medicaid Work Requirements: State Implementation Options." CMS Guidance, 2025.

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