



June 15, 2015

Delivered by Federal e-Rulemaking Portal

Adele Gagliardi, Administrator
Office of Policy Development and Research
Employment and Training Administration
U.S. Department of labor
200 Constitution Avenue NW, Room N-5641
Washington DC 20210

Attention: **Regulatory Information Number 1205-AB73 –Docket Number ETA-2015-0001 (Workforce Innovation and Opportunity Act; Notice of Proposed Rulemaking; Proposed Rules)**

Administrator Gagliardi:

Following are the comments of the Wyoming Department of Agriculture (WDA) on the U.S. Department of Labor's (DOL) notice of proposed rulemaking (Proposed Rule) for the Workforce Innovation and Opportunity Act.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this Proposal impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions, including appeals and resolutions, as well as continue to provide us the opportunity to express pertinent issues and concerns.

The WDA is extremely concerned with the proposed changes to 20 CFR 654, subpart E, regarding the applicable standards for housing for agricultural workers. The Proposed Rule would eliminate an existing understanding and system standard that has been in effect for over 35-years. These proposed changes have the potential to impose significant expenses and hardship upon the agricultural industry and agricultural employers.

The WDA does not believe the DOL provides sufficient information or justification for changing from Employment and Training Administration (ETA) standards to Occupational Safety and Health Act (OSHA) standards, besides the comment to reduce administrative burdens. The WDA does not support the

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change without a full breakdown and explanation of the differences between OSHA and ETA standards and how these changes will affect agricultural employers. WDA insists on a full economic evaluation of the impact the Proposed Rule changes will have on agricultural employers.

We strongly believe the Proposed Rule will impact Wyoming's agricultural industry, and urge DOL to withdraw the Proposed Rule as it is written.

The WDA appreciates the opportunity to comment on the Proposed Rule.

Sincerely,



Doug Miyamoto
Director
Wyoming Department of Agriculture

DM/cw

CC: Governor's Policy Office
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