Immigration Policy and Firms' Labor Demand

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Very Preliminary Draft

Abstract

This paper examines how firms adjust their labor demand to changes in immigration policy. Using a novel panel data on firms' H-2B visa applications and exploiting the temporal and geographic variation in the adoption of tougher immigration enforcement, we find that firms request fewer low-skilled workers under the H-2B program in response to stricter immigration enforcement, even though more firms are participating in the program. The reduced demand for workers under the H-2B program appears to be driven by firms whose prior H-2B worker requests had been only partially certified, and by a decrease in very large labor requests. Altogether, the results point to higher recruiting costs as the likely explanation. Stricter immigration enforcement creates labor shortages that push firms to search for low-skilled labor through the H-2B program; however, the bureaucracy, uncertainty, and higher costs associated to that recruitment process deters them from requesting a larger number of workers.

Keywords: Labor Demand, Immigration Enforcement, Unauthorized Immigration, Low-skilled Workers, United States.

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1. Introduction

Many countries have enacted and intensified immigration restrictions in recent years with the pretense of protecting native workers. In the United States, almost 3 million undocumented immigrants were deported, mostly for non-criminal offenses,[4] between 2009 and 2016 because of intensified immigration enforcement.[5] Many of these migrants were employed in low and medium-skilled service occupations (Borjas 2017). Therefore, the intensification of immigration enforcement might have restricted labor supply in some of those local labor markets. Despite the wide use of immigration policies (*e.g.* Clemens *et al*. 2018), we still have a limited understanding of how they impact firm's labor demand.

In this paper, we examine how recent immigration policies in the United States affect firms' demand for low skilled foreign-born workers using a novel panel data on firms' H-2B-visa applications. The H-2B visa program is designed to allow for the hiring of foreign workers for non-agricultural short-term low-skill jobs, mostly personal and service occupations. Hence, firms facing labor shortages caused by immigration policies may naturally consider this program as an alternative recruitment channel. However, the structure of the program requires firms to plan their labor demand well in advance and fulfill a series of labor market requirements, including offering a wage deemed fair by the Department of Labor.[6] Given the non-routine nature of many occupations included in the H-2B program,[7] firms might find it hard to adjust to the labor shortage by changing their production technology (*e.g.* Autor, Levy

[4] Most of these deportations were caused by non-criminal immigration violations, such as, staying in the United States after visa expiration. See https://trac.syr.edu/immigration/reports/583/

[5] see https://www.migrationpolicy.org/article/obama-record-deportations-deporter-chief-or-not

[6] Firms must offer a minimum wage set by the Department of Labor. This wage lies in general above the mandatory minimum wage and is influenced by other local labor market conditions. We discuss the institutional setting in detail in Section 2.

[7] The main occupations held among H-2B visa holders are building and grounds cleaning and maintenance, food preparation, personal care, and services.

and Murnane 2003, Autor and Dorn 2013, Clemens *et al*. 2018).[8] For that reason, focusing on the H-2B visa program can shed some light on how firms adjust their labor demand for low-skilled workers to labor shortages stemming from immigration policy changes.

Learning about how firms adjust their labor demand in response to changes in immigration policy is of interest from a policy perspective. The literature has documented how low-skilled workers, specifically in personal and services, can complement high-skilled workers, raising their productivity and earnings (*e.g.* Peri 2012, Cortes and Pan 2013) and, correspondingly, innovation and economic growth (*e.g.* Kerr and Lincoln 2010, Peri *et al*. 2015, Mayda *et al*. 2018).

Exploiting the temporal and geographic variation in the adoption of tougher immigration enforcement at the local and state levels, we find that immigration polices lead to a significant reduction in firms' demand for foreign-born low-skilled workers under the H-2B visa program. A one standard deviation increase in the intensity of interior immigration enforcement policies reduces the number of requested workers by 1.07 or approximately 4 percent. An examination of the dynamic impacts of immigration enforcement reveals a gradual process. Three years after the introduction of immigration policies, the number of requested workers is around 40 percent lower relative to the year prior to the policy enactment. The gradual decline in the total number of requested workers as immigration enforcement is suggestive of firms' recruitment strategies changing over time, possibly due to the bureaucracy, uncertainty and, overall, higher costs associated with the process, which can result in fewer workers being requested through this channel (see the model by Chassamboulli and Peri (2015) for a similar mechanism).

[8] Changes in production technology could bias any estimated impacts. While a solution would be to take firms' adjustment strategies into account, data on changes in firms' production technology is, to the best of our knowledge, not readily available.

In line with this explanation, we find that, although firms are more likely to participate in the H-2B program as immigration enforcement intensifies, they reduce their demand for low-skilled guest workers. Nevertheless, this result hides distinct hiring dynamics on the part of firms. Firm demands for a relatively small number of workers (*i.e.* between 1 and 10 workers) appear to rise with intensified immigration enforcement, whereas firm demands for a relatively large number of workers (*i.e.* 46 to 65 workers) seem to decline. The differential response to interior immigration enforcement appears to be driven by firms' prior experience with the H-2B visa application process, and whether their prior requests were only partially certified or approved. These differential responses are not likely to be capturing productivity differences across firms, since the analysis accounts for firm fixed effects.

In sum, immigration enforcement seems to have lowered firms' demand for low-skilled workers under the H-2B visa program, possibly due to their prior experience with the process and the higher recruiting cost associated to this lengthier, bureaucratic and, in particular, uncertain channel. Our findings contribute to a small, but growing, literature on firms' response to immigration policies. Previous studies have examined how firms adjust to local labor supply (*e.g.* Dustmann and Glitz 2015, Kerr *et al*. 2015), as well as some work examining the response to labor shortages in the farm sector created by changes in the Bracero Program or employment verification mandates (Clemens *et al*. 2018). Yet, to date, we have a limited understanding of how firms adjust their labor demand to labor shortages emanating from intensified interior immigration enforcement outside agriculture. We gauge firms' adjustment at both the extensive margin (more firms participating in the H-2B visa application process) and the intensive margin (fewer workers being requested by firms). Intensified immigration enforcement appears to raise the number of firms using the H-2B visa channel as an alternative recruitment method. However, possibly due to the uncertainty characterizing the process, firms are less likely to rely on the process to fulfill larger labor needs. Being able to distinguish

between those two margins is important in obtaining a comprehensive picture how immigration enforcement affects labor markets and firms' labor demand (see also the discussion in Beaudry *et al*. 2018).

In addition, our findings contribute to an extensive literature on the labor market impacts of immigration policies which has primarily focused on the response of workers, as opposed to firms (*e.g.* Foged and Peri, 2016; Clemens *et al*. 2018, East *et al*. 2020, Amuedo-Dorantes *et al*. 2020). By looking at firms, while accounting for their idiosyncratic technological traits through the use of individual fixed-effects, we can gain a better understanding of how they adjust their labor demands to immigration policy changes.

In that regard, we add to the literature on firms' recruitment policies (*e.g.* Wolthoff 2018, Carillo-Tudela *et al*. 2020, Mueller *et al*. 2020). We show that immigration policies can substantial change firms' hiring strategies. While a growing number of firms appear to participate in the bureaucratic, uncertain and, therefore, expensive H-2B visa program as an alternative channel to recruit workers in the midst of intensified immigration enforcement, the overall number of requested workers through this channel has decreased. The decrease stems from firms soliciting a large number of workers –the uncertainty associated to the lottery might render this channel as a risky choice when trying to address larger labor needs. The mixed impact of intensified immigration enforcement on firms' usage of the H-2B visa program and on their specific labor demands contributes to the close to null or, sometimes, negative impact of immigration enforcement on labor market outcomes (Chassambouli and Peri 2015; Amuedo-Dorantes *et al*. 2020, East *et al*. 2020).

The rest of the paper is organized as follows. Sections 2 and 3 describe the institutional framework and data, respectively. Section 4 outlines the empirical approach. Section 5 presents the main results, and Section 6 concludes.

2. Institutional Framework

2.1 H-2B Program

The H-2B visa program has allowed U.S. employers to recruit low skilled foreign-born individuals under the Immigration and Nationality Act since 1952. The 1986 Immigration Reform and Control Act separated the H-2 visa program into two programs: one for agriculture workers (H-2A) and another one for non-agriculture workers (H-2B). In this study, we focus on the impact of intensified immigration enforcement on the broader group of low-skilled non-agriculture workers.

Under the H-2B program, employers can recruit low skilled foreign-born workers to perform temporary non-agriculture work. Employers who decide to hire workers under the H-2B program face a multi-step process that involves three different departments. First, applications are submitted to the Department of Labor (DOL), which screens them and confirms that no native workers can be hired for the job, and that that the request does not harm the hiring, wages, or other working conditions of similar U.S. workers. If the application is approved by the DOL, the employer can submit its application to the Department of Homeland Security (DHS), which applies the cap,[9] and forwards it (if approved) to the Department of State. The Department of State screens the workers applying for H-2B visas at U.S. embassies. At this stage, firms are required to pay for all costs associated with the process: a $1,440 visa application fee charged by DHS,[10] and a $190/worker fee charged by the Department of State. In addition to these fees, employers must cover all travel costs and agent fees.

Employers must fulfill several requirements to participate in the H-2B program. To obtain a Temporary Labor Certification (TLC), employers must follow a series of steps, including posting the job advertisements, contacting former workers and union representatives,

[9] The Immigration Act of 1990 established that the H-2B visa program is subject to an annual cap of 66,000 visas.

[10] See: https://www.uscis.gov/i-129

paying a wage equal to or higher than the prevailing federal, state, or local minimum wage, paying for transportation costs, and assuring a minimum number of work hours to the H-2B workers.[11] DOL is the primary agency enforcing the H-2B requirements and can audit employers. The agency delegates the authority to investigate and verify that no U.S. workers were available to perform the job and that the application satisfies all the H-2B program requirements to the Wage and Hour Division (WHD).

Once the TLC is approved by the DOL, the DHS processes the application. Applications are processed sequentially according to when they were received until the cap is reached, except when many petitions are received in the first five days of the filling period.[12] In that case, the DHS randomly allocates the H-2B visas. Until January 2018, H-2B visas were adjudicated on a first come-first served basis.[13] On February 7, 2018, the DHS announced for the first time the need to conduct a visa lottery for the second half of the fiscal year.[14] Since then, the DHS has randomly issued H-2B visas. Hence, firms hiring low-skilled workers under the H-2B program face a long, bureaucratic, and increasingly uncertain and costly process.

2.2. Firm Responses to Labor Shortages

Immigration enforcement has led to the deportation of a substantial share of undocumented workers,[15] which might have diminished the pool of low-skilled immigrant labor available to firms. There are various ways in which firms can adjust to the labor shortage:

[11] See: https://www.dol.gov/agencies/whd/fact-sheets/69-h2b-requirements.

[12] DHS can issue up to 33,000 H-2B visas in the first half of the fiscal year, and 33,000 H-2B visas in the second half of the fiscal year.

[13] Our results are robust to the exclusion of the last 2 years when DHS started to assign visas by lottery.

[14] See: https://www.uscis.gov/about-us/uscis-completes-random-selection-process-for-h-2b-visa-cap-for-second-half-of-fy-2018.

[15] In Table A4 in the appendix, we show that immigration enforcement policies have significantly increased the number of deportations. East *et al.* (2020) provide evidence that immigration policy has led to a fall in employment of likely undocumented immigrants.

they might change their production technology, hire low-skilled natives, and/or turn to the available H-2B visa program.[16]

Firms might adjust to a labor shortage by investing more in capital or adopting labor saving technologies (see, for example, Clemens *et al.* 2018). Nevertheless, most jobs performed by low-skilled workers hired through the H-2B visa can be characterized as labor-intensive, involving non-routine work that is harder to automate (*e.g.* Autor, Levy and Murnane 2003, Autor and Dorn 2013). An alternative option is for firms to hire low-skilled natives. Of course, this assumes there are native workers willing to perform the tasks at the wage and conditions offered by firms. Yet, existing evidence suggests that immigration enforcement has a null to limited impact on the employment of native workers (*e.g.* Amuedo-Dorantes *et al*. 2020; East *et al*. 2020). Finally, confronted with a shortage of low-skilled immigrant workers and unable to hire native workers, firms might turn to the H-2B visa program. In what follows, we assess the extent to which firms seem to have done so.

3. Data

3.1 Data on Firms' Labor Demand

We rely on various data sources to construct a firm panel for our analysis.[17] The main source of data on firms' labor demand is the H-2B disclosure data from the Office of Foreign Labor Certification (OFLC). We use the public disclosures files for fiscal years 2010 to 2019.[18] The data includes the entire universe of employers' H-2B Applications for Temporary Labor Certification for Non-Agricultural Workers and the certification determinations processed by the Department's Office of Foreign Labor Certification, Employment and Training

[16] It is also possible for firms to exit the market. The data do not allow us to assess if that was the case.

[17] Summary statistics are reported in Table A1 in the Appendix.

[18] Although the data is available since 2008, the number of workers requested is available since 2010.

Administration.[19] For each employer, we have information on the number of requested workers, the date the application was submitted, the firm's zip code, its name, as well as the SOC code for which workers were requested.

We use the firm's name and zip code to create a firm-level panel. A drawback is that names may vary over time. For example, the firm "ACME Ltd" might be listed as "ACME" in 2011, as "Amce ltd" in 2012, and as "acme Limited" in 2014. We take this into account when constructing a firm identifier. First, we remove all words and abbreviations from a firm's name that are not consistently entered in the database, such as the firm's legal status. We also do some additional cleaning, removing all punctuation and non-numeric characters from the firm's name. After transforming each firm's name into lower case letters, we compare firms' names within each zip code. Because a direct comparison is likely to result in just a few matches, we use the Jarow-Winkler (JW) distance criterion, which enables us to gauge how similar to different names are. The JW distance ranges from 0 (exact match) to 1 (completely dissimilar).[20] In our work, we consider firms within the same zip code and with a JW distance below 0.25 to be the same. Therefore, they are assigned the same firm identifier.[21]

3.2 Data on Immigration Policy

To identify the impact of immigration policy on firms' demand for low-skilled labor under the H-2B visa program, we exploit the temporal and geographic variation in the adoption of the immigration enforcement policies described in Table A2 in the Appendix. We collected historical and current data for the 287(g) agreements from the ICE's 287 (g) Fact Sheet website (Amuedo-Dorantes, Arenas-Arroyo and Sevilla, 2018). Data on the rolling of the Secure Communities Program is collected from the ICE's Activated Jurisdiction document. The

[19] https://www.dol.gov/agencies/eta/foreign-labor/performance.

[20] For example, the JW distance between the entry "acme" and the entry "amce" is 0.08.

[21] We also look at county level outcomes. County information is gathered using the quarterly USPS-county crosswalks provided by the U.S. Department of Housing and Urban Development (https://www.huduser.gov/portal/datasets/usps_crosswalk.html).

National Conference of State Legislature's website provides information about the E-Verify and Omnibus Immigration laws. To account for the overall tougher interior immigration enforcement climate shaping labor supply patterns, we construct an index variable that takes into account the various policies in place.[22] First, we construct individual policy indices – namely, $IE_{c,t}^{k}$ for each *k* immigration enforcement initiative in county *c* in time *t.*[23] Subsequently, we add the various indices at the (county, time) level to obtain a proxy for the overall enforcement intensity to which firms in county *c* and time *t* are exposed –that is: $IE_{c,t} = \sum_{k \in K}^{k} IE_{c,t}^{k}$.[24] As a robustness checks, we also experiment with alternative measures of interior immigration enforcement.[25]

4. Methodology

To gauge how immigration enforcement might impact firms' demand for low-skilled workers under the H-2B visa program, we rely on a differences-in-differences approach and subsequently conduct an event study. Exploiting the geographic and temporal variation in the enactment of immigration enforcement policies, we first estimate the following equation:

$$(1) \qquad y_{i,c,t} = \alpha + \beta_1 IE_{c,t-2} + X'_{c,t}\,\gamma + \theta_i + \pi_t + \varepsilon_{i,c,t}$$

where $y_{i,c,t}$ denotes the number of H-2B workers requested by firm *i* in county *c* at time *t* (year-month). Our key regressor is the immigration enforcement index, IE_{ct}, which serves as a proxy for the intensity of interior immigration enforcement in the county where the firm operates. We measure immigration policy two months prior to the date when worker requests are

[22] See Amuedo-Dorantes, Arenas-Arroyo, and Sevilla (2018) for further description of the immigration enforcement index.

[23] *k* stands for the various interior immigration enforcement initiatives –namely: local 287(g) agreements, state-level 287(g) agreements, Secure Communities, omnibus immigration laws, and employment verification mandates, whereas *t* stands for the enactment month and year of each policy.

[24] The mean for the interior immigration enforcement index over the 2010 through 2019 period equals 1.6. It has a standard deviation equal to 0.94. The index varies between 0 (no enforcement initiatives were in place) and 5 (when all 5 policies under consideration were implemented).

[25] Results prove robust to the use of other interior immigration enforcement measures, as shown in Section 5.

submitted by firms since employers must register between 150-120 calendar days before applying.[26] The vector *X* controls for county-specific traits descriptive of the labor force composition of the county, such as its share of blacks, white, and Hispanics, as well as the county's unemployment rate, gross domestic product, and whether it has a sanctuary policy in place.[27] Finally, equation (1) includes firm, year and month fixed effects. Standard errors are clustered at the firm level.

Because an identifying assumption in difference-in-differences analyses is the lack of differential trends in the examined outcome in the absence of the policy shock, we conduct an event study. While we are not able to fully test this assumption, we can assess if firms' labor demands already differed prior to the adoption of tougher interior immigration enforcement policies. Similarly, we can learn about the dynamics of immigration enforcement impacts on firms' demand for low-skilled workers under the H-2B program in the months that follow. To that end, we estimate the following model:

$$(2) \qquad y_{i,c,t} = \alpha + \sum_{j=-3, j\neq -1}^{-2} \beta_j IE_{c,t}^{j} + \sum_{p=0}^{37} \rho_p IE_{c,t}^{p} + X'_{c,t}\,\gamma + \theta_i + \pi_t + \varepsilon_{i,c,t}$$

where $IE_{c,t}^{j}$ are indicators for each of the *j*th month preceding the enactment of the first immigration enforcement policy in county *c* at time *t*. Their coefficients inform about any anticipatory impacts of interior immigration enforcement on firms' labor demand for H-2B workers. The vector $IE_{c,t}^{p}$ contains indicators for 6-month periods starting right after the enactment of the first immigration enforcement policy in county *c*, up until 3 years later. Their estimated coefficients allow us to gauge the policy response on the part of firms and whether it is short- or long-lived.

[26] See https://www.dol.gov/agencies/eta/foreign-labor/programs/h-2b.

[27] Table A3 in the Appendix contains a description of the variables included in the analysis.

5. Preliminary Findings

5.1 Intensified Immigration Enforcement and Firms' Demand for H-2B Workers

We start by estimating equation (1) to learn about the impact of intensified interior immigration enforcement on firms' labor demand for guest workers under the H-2B visa program. Table 1 displays the results from this exercise. We estimate three different model specifications that progressively add controls to gauge the sensitivity of our estimates to their inclusion. In column (1), we only consider two key immigration policy variables –the interior immigration enforcement index that proxies for the intensity of enforcement in the county where the firm is located at the time it needs to register to apply for guest workers under the H-2B visa program, as well as a dummy variable indicative of whether the county also has a sanctuary policy in place at the time. In addition, the regression in column (1) includes firm and temporal fixed effects. Based on the estimates therein, a one standard deviation increase in the enforcement index (close to being equivalent to the adoption of one interior immigration policy) lowers firms' demand for H-2B workers by 4.2 percent.[28] Accounting for local labor market conditions –as captured by the county's unemployment rate, gross domestic product, and population composition in terms of the shares of whites, blacks, and Hispanics– only serves to slightly lower the estimated impact of a one standard deviation increase in the enforcement index from 4.2 to 3.8 percent (see column (2)).[29] Finally, if we further include occupation fixed effects at the 2-digit level in the estimation to capture unobservable traits related to technological change at the occupational level, the same increase in interior immigration enforcement lowers by 3.9 percent.

The negative impact of immigration enforcement on firms' labor demand for H-2B workers undermines the notion that firms turn to the H-2B program to address labor shortages

[28] A one standard deviation increase of the enforcement index lowers the number of workers requested by 1.1392*0.73/19.95 = 0.042 or 4.2 percent.

[29] Our results are robust to the exclusion of firms with labor requests in the one percentile of the sample.

in the midst of interior immigration enforcement. The observed response could be, however, masking differential responses on the part of firms and/or changes to the composition of firms soliciting low-skilled labor through the H-2B visa program. To gauge if that is the case, we start by modeling growth rates in the number of firms participating in the guest worker program. Based on the estimates in the most complete model specification in column (2) of Table 2, the same one standard deviation in interior immigration enforcement raises the number of firms participating in the H-2B program by 14 percent. The increase is suggestive of intensified immigration enforcement promoting the use of the H-2B visa program by firms.

Why, then, does interior immigration enforcement curtail firms' demand for H-2B workers? Table 3 addresses that question by modelling firms' propensity to request more or less workers under the program. About half of the firms solicit a relatively small number of workers –that is, less than 10 workers. A one standard deviation increase in interior immigration enforcement raises the likelihood that firms might turn to the H-2B program in search for labor by 2.7 percent.[30] However, the same increase in interior immigration enforcement lowers the likelihood of large worker requests under the program by roughly triple the amount – 3 percent. The diminished propensity to request a large number of low-skilled workers appears to drive the estimates in Table 1, suggesting that, while interior immigration enforcement led more firms to use the H-2B program to address small unmet labor demands, large requests appear to have significantly fallen. Perhaps, the long, bureaucratic and increasingly uncertain recruitment of workers under the H-2B visa program has deterred firms from using the program to address greater labor needs.

To further gauge the role that uncertainty might be playing in explaining firms' demand for H-2B workers, we make use of information on whether their past requests were fully

[30] The length of the intervals were chosen to correspond to the observed 50, 75, 90 and 95 percentiles.

certified by the DOL, partially so, rejected or even withdrawn. We create dummies for each of those events and interact them with the interior immigration enforcement index to gauge the differential response by firms to tougher enforcement based on their prior experiences with the H-2B process. Table 4 displays the results from that exercise. According to the estimate in column (1), a one standard deviation increase in interior immigration enforcement only seems to lower the number of requested H-2B workers among firms whose prior requests were partially certified by 7 percent, but not among their counterparts with fully certified requests. In this regard, the estimates suggest that, by creating labor shortages leading firms to make use of the lengthier and uncertain H-2B visa program, intensified interior immigration enforcement has made it harder for firms to address their labor demands.[31]

The remaining columns in Table 4 further document the differential impact of interior immigration enforcement on firms' propensity to request fewer or more workers based on their prior experience with the certification process. In column (1), we saw that intensified enforcement among firms experiencing partial certification in years prior are more likely to request fewer H-2B workers. In line with the results displayed in Table 3, the next columns display the results based on the number of low-skilled immigrant workers requested through the program. For instance, the estimates in column (2) confirm that firms became 4 percent more likely to request between 1 and 10 workers under the H-2B visa program as immigration enforcement rose by one standard deviation, relative to firms who were fully certified –for whom that propensity only rose by 2.4 percent.

In sum, the estimates in Tables 1 through 4 point to immigration policy curtailing firms' demand for low-skilled workers under the H-2B visa program. This negative impact is not driven by changes in the number of firms participating in the program, which actually rose for

[31] In a similar vein, firms whose prior requests had been rejected reduce their demands for H-2B workers by 13 percent.

smaller labor requests. However, immigration enforcement appears to have inhibited firms from submitting large labor requests, possibly as they became unease with the prospect of having to rely on a relatively bureaucratic, lengthy, and uncertain process to fulfill greater labor needs. Evidence that only firms whose prior labor requests had been partially certified reduce the number of requested H-2B workers as immigration enforcement intensifies further supports that notion.

5.2 Event Study Results

The difference-in-difference approach adopted thus far relies on the assumption that firms would not have altered their demand for low-skilled workers under the H-2B program in the absence of interior immigration enforcement. While we cannot fully assess that counterfactual, we can examine if firms were already behaving differently prior to the adoption of tougher immigration enforcement policies, as well as assess the immigration enforcement dynamics thereafter. To that end, we conduct an event-study by estimating equation (2), which models the numbers of requested workers within 6 months intervals after the enactment of immigration policy as outcome, using the most complete model specification in Table 1.

The results from that exercise are displayed in Figure 1 together with 95% confidence intervals. The omitted category is one month prior to the enactment of the immigration policy. Two findings are worth discussing. *First*, we do not see evidence of firms changing their recruiting behavior prior to the introduction of interior immigration enforcement policies. The estimates prior to the toughening of interior immigration enforcement are not distinguishable from zero, lending support to our identification assumptions. *Second*, the number of low-skilled workers requested by firms under the H-2B program gradually decreased over time following the introduction of tougher interior immigration enforcement policies. We do not observe any significant impact during the first two years after the first enactment –a period during which the estimates are also rather small. However, the impact becomes statistically

different from zero at conventional levels after the initial two-year period, which makes sense given the possibility of H-2B visa renewals close to that time.

Table 5 displays the results from the event study modeling firms' propensity to request a particular number of workers. None of the coefficients for the periods preceding the adoption of tougher interior immigration enforcement by the county is statistically different from zero, suggesting that firms did not change their recruiting behavior prior to the activation of tougher enforcement policies. In addition, the coefficients on the terms capturing 6-month periods following the activation of immigration enforcement policies by the county suggest that the introduction of immigration policies resulted in gradually shrinking worker requests under the H-2B visa program. Once more, as in Figure 1, the impact is hardly observable during the first two years after the first enactment –estimates are small and not statistically different from zero at conventional levels. As noted earlier, a possible explanation could be that firms can renew the contracts for workers hired under the H-2B program for a maximum duration of 3 years. Three years after the activation of intensified interior immigration enforcement, we estimate a drop of 40 percent in the number of requested workers relative to the mean.

5.3 Additional Identification and Robustness Checks

An additional identification concern in policy evaluation analyses refers to the potentially endogenous nature of policies, in the first place. While policies are never randomly adopted, from an econometric standpoint, our concern refers to whether firms' hiring practices somehow influenced the county's adoption of tougher interior immigration policies. This could occur if low-skilled natives feel their jobs are threatened by firms' reliance on low-skilled foreign labor and support the adoption of tougher enforcement policies. Note that, if the low-skilled foreign labor was hired under the H-2B program, we would then expect to observe that tougher enforcement resulted in an increased demand for H-2B workers, not a reduced demand as we find. Nevertheless, to check on this relationship, Table 6 displays the results from

modeling the adoption timing of the first interior immigration enforcement policies by the county as a function of the number of requested H-2B workers by firms in the county. Regardless of whether we include state fixed effects, we are unable to find evidence of a statistically significant relationship between firms' prior demands for H-2B workers and the adoption timing of tougher policies by the counties where they are located. Rather, the adoption timing of tougher immigration policies seems to be directly related to higher unemployment rates in the county, and inversely related to the presence of a larger share of Hispanics.

Finally, we conduct a couple of robustness checks to address the role that the introduction of the lottery in January 2018 might have played in shaping firms' recruiting practices, as well as the use of an interior immigration enforcement index as opposed to non-criminal deportations. Table 7 displays the results from these two robustness checks. In column (1), we assess the reliability of our estimates to dropping 2018 and 2019 –the two years when the lottery was implemented. Those two years might have only made the process increasingly uncertain for employers than when requests were approved on a first come-first served basis. Based on the estimates from column (1), we continue to find that a one standard deviation in interior immigration enforcement lowers the number of requested workers under the H-2B program by approximately 4.6 percent –an amount not much different from the near 4 percent in Table 1. This suggests that, while uncertainty probably added to the costs involved in using the H-2B program, the latter were probably already large enough for firms to avoid relying on the program as a means to recruit a large number of workers.

In column (2), we further experiment with using information on deportations, as opposed to the interior immigration enforcement index, to gauge the sensitivity of our findings to the use of different enforcement measures. In line with our prior findings, we show that deportations reduced the number of requested workers by firms by 4 percent.

In sum, identification and robustness checks confirm that the observed policy impacts did not predate the adoption of tougher enforcement policies, but appeared to have significantly changed in the years that followed their activation. In addition, tougher immigration enforcement policies do not seem to have been adopted in response to firms' H-2B hiring practices, nor do the results seem to significantly change when we exclude the period during which the lottery was implemented or use alternative measures of interior immigration enforcement.

6. Summary and Conclusions

We examine how firms adjust their labor demand to tougher interior immigration enforcement. Using a unique panel data on firms' H-2B visa application, we show a gradual and significant decline in firms' demand for low-skilled immigrant workers after the introduction of stricter enforcement. We find that almost the entire decline in the number of requested workers caused by immigration enforcement is driven by firms with prior H-2B worker requests that were only partially fulfilled. Taken together, these results suggest that firms learn from the uncertainty and overall costs associated with the use of the H-2B program. A look at the extensive margin reveals that counties with stricter enforcement have witnessed growth in the number of firms participating in the H-2B visa program, suggesting firms are turning to the program to fulfill their labor demands in the midst of intensified immigration enforcement. However, they are less inclined to submit larger worker requests.

In sum, immigration enforcement appears to have led firms to use the H-2B visa program as a means to address unmet labor demand; however, higher recruiting costs due to the long, bureaucracy and uncertain nature of the process might have deterred them from using it as a means to satisfy large labor demands.

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Table 1: Immigration Policy and Firms' Demand for H-2B Workers

Regressors	**(1)**	**(2)**	**(3)**
Immigration Enforcement	-1.1393***	-1.0487***	-1.0745***
	(0.382)	(0.357)	(0.355)
Sanctuary Policy	0.3358	0.2133	0.1550
	(0.869)	(0.858)	(0.885)
Unemployment Rate		-42.5978	-42.1821
		(34.202)	(34.127)
GDP		1.5706	1.4219
		(4.996)	(5.000)
Share of Blacks		12.3019	14.4221
		(27.367)	(27.418)
Share of Whites		-81.0695	-84.7217
		(135.342)	(133.144)
Share of Hispanics		0.5704	0.4464
		(1.325)	(1.322)
Constant	24.1546***	27.6604***	19.6831***
	(1.608)	(3.079)	(5.976)
Observations	62,316	62,316	62,316
R-squared	0.636	0.637	0.639
Firm FE	Yes	Yes	Yes
Year FE	Yes	Yes	Yes
Month FE	Yes	Yes	Yes
County Characteristics		Yes	Yes
Occupation FE			Yes

Notes: Dependent variable: number of H-2B workers requested by firms. All regressions include a constant term. Standard errors are clustered at the firm level. ***p<0.01, **p<0.05, *p<0.1.

Table 2
Immigration Enforcement and Growth in the Number of Firms Participating in the H-2B Program

Model Specification:	**(1)**	**(2)**
Immigration Enforcement	0.1879**	0.1885**
	(0.086)	(0.085)
Observations	10,682	10,682
R-squared	0.317	0.318
County FE	Yes	Yes
Year FE	Yes	Yes
Month FE	Yes	Yes
County Characteristics	No	Yes

Notes: Dependent Variable: Growth of firms requesting H-2B workers with respect to January 2010 (base date). All regressions include a constant term. Standard errors are clustered at the firm level. ***p<0.01, **p<0.05, *p<0.1.

Table 3: Immigration Enforcement and Firms' Demand for H-2B Workers by Size of the Labor Request

Outcome:	**(1)**	**(2)**	**(3)**	**(4)**	**(5)**
	1 to 10 workers	**11 to 25 workers**	**26 to 45 workers**	**46 to 65 workers**	**More than 65**
Immigration Enforcement	0.0188***	-0.0090	0.0001	-0.0065*	-0.0034
	(0.006)	(0.007)	(0.006)	(0.004)	(0.003)
Observations	62,316	62,316	62,316	62,316	62,316
R-squared	0.733	0.587	0.571	0.507	0.629
Firm FE	Yes	Yes	Yes	Yes	Yes
Year FE	Yes	Yes	Yes	Yes	Yes
Month FE	Yes	Yes	Yes	Yes	Yes
County Characteristics	Yes	Yes	Yes	Yes	Yes
Occupation FE	Yes	Yes	Yes	Yes	Yes
Mean D.V.	0.50	0.25	0.15	0.05	0.05

Notes: The dependent variable in column (1) is a dummy which takes values 1 if the firm requires between 1 to 10 workers, 0 otherwise. Column (2) reports the result for a dummy 1 if the firm requires between 11 to 25 workers, 0 otherwise. Column (3) and (4) show the result when the dependent variable is a dummy 1 if the firm requires 26 to 45 workers, 46 to 65 or more than 65 workers, respectively. All regressions include a constant term. Standard errors are clustered at the firm level. ***p<0.01, **p<0.05, *p<0.1.

Table 4
Differential Impact of Immigration Enforcement Based on Past H-2B Worker Request Decisions

Outcome:	**(1)**	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**
	H-2B Requested Workers	**1 to 10 workers**	**11 to 25 workers**	**26 to 45 workers**	**46 to 65 workers**	**More than 65**
Immigration Enforcement	-0.7067	0.0169**	-0.0074	0.0016	-0.0075	-0.0037
	(0.549)	(0.008)	(0.009)	(0.008)	(0.005)	(0.004)
IE *Certified	-0.1641	0.0012	-0.0019	0.0004	0.0002	0.0001
	(0.525)	(0.007)	(0.008)	(0.006)	(0.004)	(0.003)
IE*Partial Certification	-1.9242**	0.0259**	-0.0123	-0.0170	0.0065	-0.0030
	(0.879)	(0.011)	(0.012)	(0.012)	(0.008)	(0.006)
IE*Rejected	-0.3644	-0.0025	-0.0074	0.0150	-0.0036	-0.0015
	(1.105)	(0.012)	(0.012)	(0.010)	(0.008)	(0.008)
IE*Withdrawn	0.1365	-0.0237**	0.0183*	-0.0006	-0.0015	0.0076
	(0.596)	(0.010)	(0.010)	(0.009)	(0.007)	(0.006)
Certified	0.0215	-0.0001	-0.0032	0.0105	-0.0082	0.0010
	(0.540)	(0.010)	(0.012)	(0.009)	(0.006)	(0.005)
Partial Certification	-0.4589	0.0211	-0.0117	0.0075	-0.0267*	0.0098
	(1.313)	(0.021)	(0.021)	(0.022)	(0.014)	(0.011)
Rejected	-2.6628**	0.0558***	-0.0351*	0.0107	-0.0146*	-0.0168
	(1.348)	(0.021)	(0.019)	(0.019)	(0.009)	(0.012)
Withdrawn	-1.5955	-0.0068	0.0158	0.0098	-0.0083	-0.0104
	(1.318)	(0.013)	(0.015)	(0.015)	(0.009)	(0.014)
Observations	62,316	62,316	62,316	62,316	62,316	62,316
R-squared	0.640	0.734	0.587	0.572	0.506	0.628
Firm FE	Yes	Yes	Yes	Yes	Yes	Yes
Year FE	Yes	Yes	Yes	Yes	Yes	Yes
Month FE	Yes	Yes	Yes	Yes	Yes	Yes
County Characteristics	Yes	Yes	Yes	Yes	Yes	Yes
Occupation FE	Yes	Yes	Yes	Yes	Yes	Yes

Notes: The dependent variable in column (1) is the number of H-2B workers requested by firms. The dependent variable in column (2) is a dummy which takes values 1 if the firm requires between 1 to 10 workers, 0 otherwise. Column (3) reports the result for a dummy 1 if the firm requires between 11 to 25 workers, 0 otherwise; and so on. All regressions include a constant term. Standard errors are clustered at the firm level. ***p<0.01, **p<0.05, *p<0.1.

Table 5: Event Study Results by Size of the Labor Request

Outcome:	(1)	(2)	(3)	(4)	(5)
	1 to 10 workers	**11 to 25 workers**	**26 to 45 workers**	**46 to 65 workers**	**More than 65**
3 months before IE	0.0234	0.0052	-0.0363	-0.0033	0.0110
	(0.045)	(0.044)	(0.037)	(0.026)	(0.023)
2 months before IE	0.0031	-0.0428	-0.0030	0.0124	0.0303
	(0.061)	(0.056)	(0.049)	(0.035)	(0.034)
1month before IE	Omitted	Omitted	Omitted	Omitted	Omitted
0 to 6 months	0.0168	-0.0108	-0.0140	0.0023	0.0056
	(0.048)	(0.048)	(0.040)	(0.028)	(0.023)
7 to 12 months	0.0872*	-0.0620	-0.0071	-0.0178	-0.0003
	(0.048)	(0.044)	(0.037)	(0.026)	(0.023)
13 to 18 months	0.0447	-0.0342	-0.0018	0.0067	-0.0153
	(0.050)	(0.049)	(0.042)	(0.028)	(0.024)
19 to 24 months	0.0975*	-0.0682	-0.0440	0.0123	0.0025
	(0.052)	(0.049)	(0.042)	(0.027)	(0.023)
25 to 30 months	0.2146***	-0.0777	-0.0753*	-0.0281	-0.0335
	(0.053)	(0.049)	(0.042)	(0.028)	(0.024)
31 to 36 months	0.1470***	-0.0578	-0.0619	-0.0045	-0.0229
	(0.048)	(0.048)	(0.040)	(0.028)	(0.024)
More than 37 months	0.1554***	-0.0617	-0.0528	-0.0108	-0.0301
	(0.048)	(0.048)	(0.041)	(0.027)	(0.024)
Observations	62,316	62,316	62,316	62,316	62,316
R-squared	0.735	0.587	0.572	0.506	0.631
Firm FE	Yes	Yes	Yes	Yes	Yes
Year FE	Yes	Yes	Yes	Yes	Yes
Month FE	Yes	Yes	Yes	Yes	Yes
County Caracteristics	Yes	Yes	Yes	Yes	Yes

Notes: Table 5 reports the result from estimating equation (2) for the likelihood of requesting various volumes of low-skilled workers under the H-2B program. The month prior to the enactment of tougher interior immigration enforcement is omitted. All regressions include a constant term. Standard errors are clustered at the firm level. ***p<0.01, **p<0.05, *p<0.1.

Table 6: Endogenous Adoption of Immigration Policies

Outcome:	(1)	(2)
	First Year IE>0	First Year IE>0
H-2B Requested Workers	-0.0003	-0.0002
	(0.001)	(0.001)
Unemployment Rate	-0.0060	0.0168***
	(0.005)	(0.006)
GDP	0.0005	0.0013
	(0.000)	(0.001)
Share of Blacks	-6.3900	-3.5573
	(4.699)	(2.733)
Share of White	-4.0012	16.6949
	(4.314)	(14.893)
Share of Hispanics	0.8905***	-0.0645*
	(0.301)	(0.036)
Observations	2,887	2,887
R-squared	0.062	0.294
State FE	No	Yes

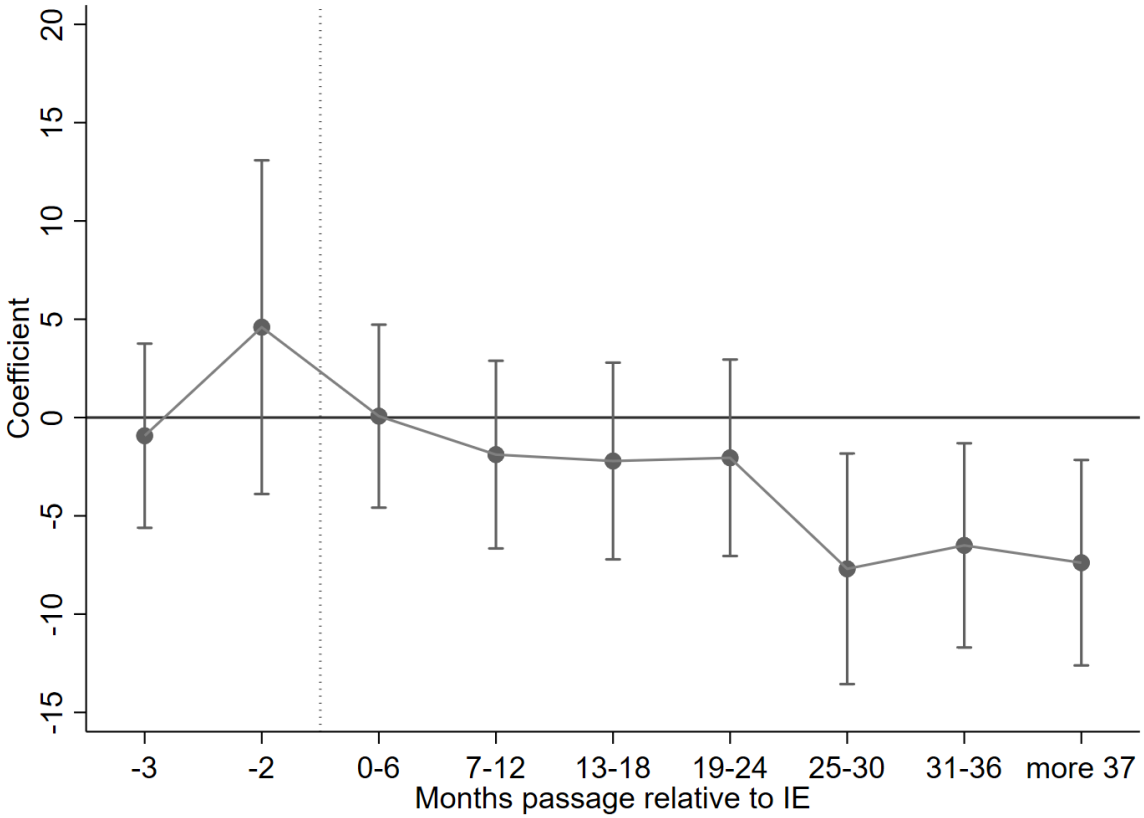
Notes: All controls variables are measured at the county level in 2010. All regressions include a constant term. Robust Standard errors are clustered at the state level. ***p<0.01, **p<0.05, *p<0.1.

Table 7: Additional Robustness Checks

Key Regressors	**Outcome: Number of Requested Workers**	
	(1)	**(2)**
	Excluding the Lottery Period	**Using an Alternative IE Measure**
Immigration Enforcement	-1.2755***	
	(0.485)	
Deportations		-0.0121**
		(0.005)
Observations	40,638	62,316
R-squared	0.680	0.640
Firm FE	Yes	Yes
Year FE	Yes	Yes
Month FE	Yes	Yes
County Characteristics	Yes	Yes
Occupation FE	Yes	Yes

Notes: Table 1 reports results from estimating equation (1). Column (1) exclude fiscal years 2018 and 2019 the years that DHS used a random process to assign the visas. Column (2) uses non-criminal deportations (those due to immigration charges) as measure of Immigration Enforcement. Robust standard errors are in parentheses and clustered at the firm level. *** p<0.01, ** p<0.05, * p<0.1.

Figure 1: Event Study: Immigration Policy and Firms' Demand for H-2B Workers



Notes: Figure 1 reports the results from estimating equation (2).

Appendix

Table A1: Descriptive Statistics

Variable	Obs	Mean	Std. Dev.
Dependent Variable			
H-2B requested workers	62,316	19.95	32.16
1 to 10 H-2B requested workers	62,316	0.50	0.50
11 to 25 H-2B requested workers	62,316	0.25	0.44
26 to 45 H-2B requested workers	62,316	0.15	0.35
46 to 65 H-2B requested workers	62,316	0.05	0.21
More than 65 H-2B requested workers	62,316	0.05	0.22
Immigration Policies			
Immigration Enforcement	62,316	1.61	0.72
County Level Controls:			
Sanctuary Policy	62,316	0.136	0.34
Unemployment Rate	62,316	0.05	0.02
GDP	62,316	0.02	0.04
Share of Blacks	62,316	0.12	0.12
Share of Whites	62,316	0.82	0.13
Share of Hispanics	62,316	0.14	0.15

Table A2: Interior Immigration Enforcement Policies

Nature of the Law	Law	Years	Objective	Who implements it?	Scope	What it Consists of:
Police-Based Measures	**287(g)**	2002-2012 2019-	Make communities safer by the identification and removal of serious criminals	State and local law enforcement entities	State and Local (County, City or Town)	**Task Force**: allows local and state officers interrogate and arrest noncitizens during their regular duties on law enforcement operations. (2002-2012) **Jail enforcement** permits local officers to question immigrant who have been arrested on state and local charges about their immigration status. **Hybrid model:** which allow participate in both types of programs. **Warrant Model:** nominated state and local law enforcement officers will be trained, certified, and authorized by ICE to perform limited functions of an immigration officer within the law enforcement agency's jail and/or correctional facilities
	SC	2009-2014 2017-	Identify noncitizens who have committed serious crime using biometric information	Police	County	The program allows for the submission of biometric information on detainees that is contrasted against records in FBI and DHS databases.
	OILs	2010-	Identification noncitizen	State and local law enforcement entities	State	Comprehensive laws that may include: • A "show me your papers" clause, enabling the police to request proper identification documentation during a lawful stop. • Require that schools report students' legal status.
Employment-Based Measures	**E-Verify**	2006-	Deter the hiring of unauthorized immigrants.	Employer	State	Electronic program that allows employers to screen newly hired workers for work eligibility.

Table A3: Main Variable Definitions and Sources

Variable Name	Definition	Source
H-2B requested workers	Number of H-2B workers requested by firms.	Office of Foreign Labor Certification (OFLC).
Immigration Enforcement Index	Intensity of interior immigration enforcement policies in place in the county.	Data on 287(g) agreements and Secure Communities is gathered from ICE's website, and data on OILs originates from the National Conference of State Legislatures website.
Sanctuary Policy	Dummy variable equal to 1 if the county adopted a sanctuary policy.	National Conference of State Legislatures.
Share of Blacks	Share of Blacks by county.	United States Department of Health and Human Services (US DHHS), Centers for Disease Control and Prevention (CDC), National Center for Health Statistics (NCHS), Bridged-Race Population Estimates, United States July 1st resident population by state, county, age, sex, bridged-race, and Hispanic origin. Revised bridged-race 2000-2009 intercensal population estimates (released by NCHS on 10/26/2012); and bridged-race Vintage 2019 (2010-2019) postcensal population estimates (released by NCHS on 7/9/2020). Available on CDC WONDER Online Database. Accessed at http://wonder.cdc.gov/bridged-race-v2019.html on Jan 21, 2021
Share of Hispanics	Share of Hispanics by county.	
Share of White	Share of White by county	
GDP	Gross Domestic Product by county	U.S. Bureau of Economic Analysis
Unemployment Rate	Unemployment Rate by County	U.S. Bureau of Labor Statistics

Table A4: Immigration Enforcement and Interior Removals 2010-2019

	(1)	(2)
	Total Removals	**Non Criminal Removals**
Immigration Enforcement	3.6582***	1.6265***
	(1.225)	(0.453)
Observations	26,110	26,110
R-squared	0.783	0.733
County FE	Yes	Yes
Year FE	Yes	Yes

Notes: Dependent variable is the number of individuals remove by Immigration and Customs Enforcement. Non-criminal removals are defined according to the list of violations in section 237(a) of the Immigration and Nationality Act (INA) (https://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-prelim-title8-section1227&num=0&edition=prelim).

Source: https://trac.syr.edu/phptools/immigration/remove/