THESIS

CIVIL RIGHTS, POLICY DIFFUSION AND THE COEVOLUTION OF IMMIGRATION

AND PUBLIC HEALTH IN THE AMERICAN FOOD SYSTEM

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ABSTRACT

CIVL RIGHTS, POLICY DIFFUSION AND THE COEVOLUTION OF IMMIGRATION AND

PUBLIC HEALTH IN THE AMERICAN FOOD SYSTEM

This research uses the 'policy diffusion framework' to analyze the mechanisms and motivations behind policymaking in the American food system and draw conclusions about the relationship between the policy process and civil rights. It also utilizes analytical concepts lent by historic institutionalism such as process tracing and critical junctures to create a narrative of policy evolution from a cross-case analysis of the most salient issues facing the food system including immigration and public health policies. A case study of the northern Colorado food system details a series of policy adoptions in these issue areas, offering metrics for measuring equality. I hypothesize that the policy diffusion process in the real world has a causal relationship with the civil rights of immigrants and migrants working in food service. I ask the research question, what is the relationship between the policymaking process and civil rights in the food system, and what mechanisms of policy diffusion are active? I find that the policy diffusion process has the best outcomes for civil equality when there is a diversity of stakeholders who take a collaborative approach to the process and share information quickly and often. But, when decisionmakers bias the process by excluding or favoring sets of stakeholders, then the information flow is crippled and policy outcomes negatively affect civil rights.

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Chapter 1 - Introduction

This research uses the 'policy diffusion framework' to analyze the mechanisms and motivations behind policymaking in the American food system in order to draw conclusions about the relationship between the policy process and civil rights. It also utilizes analytical concepts lent by historic institutionalism such as process tracing and critical juncture theory to create a narrative of policy evolution in a cross-case analysis of the most salient issues facing the food system including immigration and public health policies. The food system can be thought of as anything and anyone who is involved in the production, distribution, and consumption of food. We are all members of the food system to a degree.

When it comes to studying equality in American food processing, issues of immigration, public health, and labor policy overlap one another in critical ways. A case study of northern Colorado details a series of policy adoptions in each of these issue areas from the past twenty years and is a basis for measuring equality. I hypothesize that the policy diffusion process in real-time has measurable impacts on equality in the food system. I ask the research question, what is the relationship between policy and equal rights in the food system, and what mechanisms of the policy diffusion framework are active? I find that the policy diffusion process has the best outcomes for civil equality when there is a diversity of stakeholders who take a collaborative approach to the process and share information quickly and often. But, when decisionmakers bias the process by excluding or favoring sets of stakeholders, then the flow of information diminished and policy outcomes negatively affect civil equality. At a conference hosted by Colorado State University in January of 2020, inadequate public policies and issues of equality were agreed upon as the most important problems facing the system (Colorado Food

Summit, January 2020). Years of failed immigration policies and public health crises like Covid-19 outbreaks in processing facilities threaten the sustainability and resiliency of the food system.

The policy diffusion framework is well suited to tackle this topic matter. To root out systemic inequalities deeply entrenched in the food system, then research needs to weed through the policy process on a case-by-case basis, something that's sore easily accomplished with the help of a theory like this. Hal Holbrook, known as "Deep Throat" in *All the President's Men* coined the famous adage "just follow the money" to expose corruption. But in these cases, it is as important to follow the policy. The literature directs the researcher to focus on the relationships between government agencies and jurisdictions, specifically how they communicate and influence policy decisions, as opposed to studying agencies and policy adoptions as being autonomous from one another (Berry and Berry, 2018). The vast majority of policies, it asserts, are not original creations, but are transfers or mutations of policies that have already been implemented by another jurisdiction or agency. What is drawn out through the case study is that the ways in which policies are made, specifically how they are diffused from one unit to another, has an impact on the quality of the policy outcome. Most policy adoptions are influenced by other units of government, and are shaped by a sequence of critical moments in history.

The United States is a world leader in agricultural production, but would not be so were it not for the contributions of generations of migrant and immigrant laborers. Unfortunately, the exploitation of these workers based on race and citizenship status has long been unchecked or enabled by government policy. Current events demonstrate that the historic fight for civil rights in America's food sector is far from over. I learned that progress in this realm has and always will hinge on grassroots participation in the policy process. With guidance from the policy

diffusion framework, the case study takes inventory of the current status of civil rights and equality in the food system, and is connected to the longer history of the Civil Rights Movement.

Food processing and distribution in the United States has made strides in health, safety and equality since Upton Sinclair's historic 1906 novel "The Jungle" exposed abhorrent working and living conditions in Chicago's meatpacking districts. His accounts of conditions in the plants shocked American consumers and was justification for the Pure Food and Drug Act of 1906. The legislation set an early precedent for government's role in protecting the health and safety of workers and consumers, paving the way for agencies like Food and Drug Administration (FDA) and the Occupational Safety and Hazard Administration (FDA, 2019). Beginning in the 1950s and through the 1970s, the Chicano Movement organized Latino and immigrant farmworkers first in California and then across the nation. Monumental labor and civil rights victories were again realized for food system workers via policy change. Yet, research shows the food system is still mired in lasting inequalities for immigrant communities and people of color at every point of the supply chain (Solis, 2020).

Although policy change has always been a necessary catalyst for positive change in the food system, it has also been a cause of its lapses. In the first two cases, involving early 2000s immigration reform and policy responses to Covid-19 outbreaks in meatpacking facilities in 2020, the framework reveals the clearest examples of how the policy process can be liable for tragic civil rights violations when communication mechanisms are compromised. The first case I analyze follows the policy evolution of Secure Communities, a post 9/11 policy creation of the Department of Homeland Security (DHS) and enforced by Immigration and Customs Enforcement (ICE). It was an instrument for the largest immigration raids at workplaces in the nation's history (Kammer, 2009). Diffusion into lower levels of government was accomplished

through coercive tactics and justified by nativist sentiment in the wake of the September 11th terrorist attacks. When this tactic proved responsible for egregious civil rights violations by the DHS's own admission, the policy diffusion process took an intriguing turn towards a more appropriate immigration enforcement policy (DHS, 2011).

The second case traces the policy response to Covid-19 outbreaks at meatpacking facilities in 2020. Effective responses were muddled by incompatible policy adoptions at different levels of government. Six workers were killed and hundreds more infected at the JBS Beef plant in Greeley, Colorado, making it the deadliest Covid-19 outbreak at a food processing facility; all six were either immigrants or refugees of Latino or Asian descent, prompting inquiries at the federal level into civil rights violations, including an entire House select-subcommittee focused solely on the meatpacking industry (Clyburn, 2021). Evidence is mounting that the magnitude of the outbreaks in food processing facilities could have been lessened, but both corporate and government officials jeopardized the health and safety of workers (Newell and Sinclair, 7/2020). The initial policy response by state and local health officials was rebutted by the White House and agencies like the CDC, and a lack of communication was at the center of policy failures (Newell and Sinclair, 7/2020).

Despite the fact that there are several large food processing facilities including the JBS Swift Beef plant on Greeley's northeast side, irony prevails as most of the neighborhoods around them are food deserts, meaning their residents lack equal access to full-service groceries (EPA et al., 2016). They are the focus of the third case, and within it is an example of policy diffusion where the mechanisms are being used to effectively move the system towards greater civil equality. The USDA defines food deserts as low-income neighborhoods or communities that don't have full-service grocers within a one-mile radius. Food deserts in the US are also likely to

be majority Black and Latino and include neighborhoods that have been historically segregated, begging questions of racial equality. Extensive research from the fields of public health to sociology has come to recognize the problem of food deserts as an issue of civil rights. Concepts like 'local food' and 'food sovereignty' are at the fore of social movements and policy programs targeted at access to nutrition, also termed 'food justice.' One such program is a federal grant administered to local school districts by the USDA to improve the quality of school meals by signing contracts with local suppliers of fresh produce. In theory, the program strengthens the local economy and provides an outlet for consistent, nutritionally dense food in places where there may not be much elsewhere (Christensen et al., 2017). Policymaking in this last case instrumental for protecting civil rights when diffusion mechanisms are used appropriately.

It would be inappropriate to make any conclusions about the struggle for civil rights in today's food system without paying homage to its history, so, the chapter between the literature review and the case study is dedicated to doing that. Current events and policies in the case study are shaped by the past as much as by the present, so a brief chapter on the civil rights history of agricultural labor is in order as much as a literature review of the policy diffusion framework. Out of three historical junctures critical to the case study, the first two are considered to be the Mexican Revolution (1910-1920) and the Bracero Program (1942-1963), which pushed and pulled, respectively, waves of annual migrant workers from Mexico to the US. The third critical juncture is the Chicano Movement (1950s-1970s), a civil rights campaign that ended the era of the Bracero Program and established a political movement for better working and living conditions.

Finally, the history combined with the cases help to fill a gap in a popular variety of academic literature on the food system. Academic conversations about inequality in food

processing are abundant, but how immigration fits that narrative is more difficult to come by (Colorado Food Summit, 2020). For this reason, the historical background will focus on the story of immigrant labor in the region featured in the case study.

Chapter 2 - Literature Review

Policy Diffusion Framework

The policy diffusion framework is a robust method for investigating how, and why, governments and agencies implement the policies that they do. Several in depth literature reviews of the policy diffusion framework have been written over time (Shipan and Volden, 2008; Mintrom and Vergari, 1998; Berry, 1994; Berry and Berry, 1990; Walker 1969; Berry and Berry, 2018).[1] This thesis relies most heavily on the works and interpretations of Berry and Berry's unified model of policy diffusion because of its flexibility in terms of being applied to case studies.

Policy is not created in a vacuum, rather most policies spread from one unit of government to others. "Unless the two governments arrived at the same (or very similar) policy via a highly improbable coincidence, at a minimum there must have been diffusion from one government to the other of the *idea* for the policy" (Berry and Berry, p. 265, 2018). Adoption of a policy that preexists elsewhere is termed "policy innovation," as opposed to policy invention.

Policy diffusion literature draws from social network analysis, communication studies, and other diffusion models from fields like economics. Diffusion of policy is a process where "innovation is communicated through certain channels over time among the members of a social system" (Rogers, 1995; Berry and Berry, p. 253-54, 2018). These policy channels and networks can form vertically, say, between levels of agencies in a federal system; horizontally between agencies at the same level, or between different national governments; and they can form between public and private entities (Zhang and Zhu, 2016).

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[1] Berry and Berry (2018) is Chapter 7 - "Innovation and Diffusion Models in Policy Research," in: Weible and Sabatier (2018). "Theories of the Policy Process." Fourth edition. Taylor and Francis, Westview Press.

Individuals and organizations advocating for policy change within these channels and networks are "policy entrepreneurs" (Berry and Berry, 256, 2018). Mintrom (1997) characterizes them as those who "initiate dynamic policy change" by identifying policy problems, attracting policymakers, building coalitions and framing the terms of debate (Mintrom, p. 739, 1997). Policy entrepreneurs are essential to the diffusion process because they are the ones most actively engaged in it.

Models within the policy diffusion framework employ five mechanisms and motivations to make assumptions about what drives diffusion. 1) The *learning* mechanism assumes that "learning occurs when policymakers in one jurisdiction derive information about the effectiveness (or success) of a policy from previously adopting governments" (Levy, 1994; Braun and Gilardi, 2006; Berry and Berry, p. 256, 2018). 2) The *imitation* mechanism is simply the emulation of Jurisdiction B's policies by Jurisdiction A "independently of any evaluation of the character of the policy or its effectiveness" (Simmons et al., 2006; Meseguer, 2006; Karch, 2007; Berry and Berry, p. 257, 2019). 3) *Normative pressure* is a mechanism by which Jurisdiction A adopts a policy not as a function of learning or imitating, but because many other jurisdictions with similar values are adopting it (DiMaggio and Powell, 1983; Sugiyama, 2012, Berry and Berry, p. 257, 2018). 4) In a display of the *Competition* mechanism, usually to gain an economic advantage over Jurisdiction B, then Jurisdiction A will quickly adopt certain policies. 5) Jurisdiction A may also be "*Coerced* into adopting a policy when a more powerful government" incentivizes, or mandates, it do so. (Hoekstra, 2009; Hinkle, 2015; Berry and Berry, p. 259, 2018). Common in the American federalist system are instances of vertical diffusion between local, state, and federal levels of government. In such cases, the federal or

national government may use a "carrot" to incentivize policy adoption by sub-units, or it may use a "stick" to simply mandate policy adoption without question (Berry and Berry, p. 259, 2018).

These five mechanisms are employed in the use of three "external" models[2] including the "national interaction" model, the "regional diffusion" model, and the "leader-laggard" model. Each pivot mostly on the learning mechanism, especially the national interaction model. It assumes that jurisdictions innovate by interacting with one another in settings like professional conferences and other, similar channels (Berry and Berry, p. 262, 2018). Regional diffusion hypothesizes that neighboring jurisdictions, or those that share a region, are more likely to adopt the same policies because their geographic proximity accentuates mechanisms like learning, competition and imitation. Finally, the Leader-Laggard model suggests that for whatever reason, be it population or available resources, some jurisdictions are more innovative than others, and are quicker to adopt policies from elsewhere (Berry and Berry, 1990; Mintrom, 1997; Balla, 2001; Berry and Berry, p. 263-64, 2018).

"Internal" models emphasize political, economic, and social characteristics endogenous to the jurisdiction as the factors affecting its propensity to innovate (Berry and Berry, p. 254, 265, 2018). Many of these studies assume that larger governments and jurisdictions will have more capacity to innovate, as will those with more financial resources. Therefore, these are the jurisdictions that innovate the earliest and most frequently. Others draw from organizational innovation literature, assuming that a jurisdiction's behavior towards innovation is comparable to other types of organizations, and that their motivation to innovate is inversely related to the obstacles (Walker, 1969; Berry, 1994; Berry and Berry, p. 268, 2018).

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[2] External models assume the causal mechanism for policy innovation are exogenous to the jurisdiction. In other words, the motivation for adopting a policy is fed by outside influences.

The inverse relationship between internal motivations and obstacles is best portrayed as the interplay of "problem severity," e.g., intensely poor economic conditions motivate policy action, with financial obstacles from a lack of monetary resources; following the example, because the economic conditions are so poor, policy innovation is unfeasible despite being in demand (Walker, 1969; Berry, 1994; Berry and Berry, p. 268, 2018).

The Berry and Berry (1990) unified model tests for mechanisms both internal and external to the jurisdiction(s) adopting policy. Before 1990, policy diffusion studies were severely limited by testing for either external or internal determinants, without considering them together. Berry and Berry (1990) emphasized the flaws of studying them separately, and put forward the argument for a unified model. Since then, the unified model has been employed in some notable, comparative studies, like testing for motivations and obstacles in the process of state lottery adoption (Berry and Berry, 1990); local, smoking policies (Shipan and Volden, 2008); and state-level drinking and driving policies and enforcement (Hwang and Berry, 2019). These studies use different combinations of internal and external factors as independent variables, and measure for changes in the likelihood for policy diffusion. They find a great degree of regional policy diffusion in state lottery adoption, the presence of most mechanisms in the transfer of local smoking policies, and that increased innovativeness led to more comprehensive traffic enforcement policies, respectively (Berry and Berry, 1990; Shipan and Volden, 2008; Hwang and Berry, 2019).

Method

While Berry and Berry's unified, policy diffusion model is my primary method in this cross-case analysis of American food system policy, I also borrow lightly from the analytical toolbox of historical institutionalism by incorporating process tracing to identify critical

junctures and explain their relationship with the issues in the case. Scholars have previously taken elements of historical institutionalism to amend policy diffusion studies. They assert that policy adoptions are a function of history just as much as they are a product of diffusion from one unit of government to another (Kato, 2003; Beach, 2017). Normally, a policy diffusion study includes a quantitative analysis of time series data, and often uses an "event history analysis," (EHA). Also referred to as a "risk" or "hazard" model, an EHA is a statistical regression used to predict the likelihood of a particular event occurring, or policy adopted, based on past data (Berry and Berry, p. 277, 2018). Because this thesis is a qualitative use of the framework, then process tracing takes the place of what would be an EHA. Without an EHA the findings cannot predict with statistical accuracy what hazards or risks are most likely to occur in the future of the food system. But, a qualitative analysis of the past and present of the food system does reveal causal relationships and measures change over time, producing patterns that could be verified by future, statistical analysis.

EHA's and simply quantitative studies run the risk of ignoring crucial contexts and variables that a qualitative approach is more likely to capture. An EHA predicts the likelihood of a certain policy being adopted based on past frequencies, but it can't distinguish between what is and isn't a civil rights violation or who is responsible, nor can it tell us why a given policy has a positive or negative outcome on civil equality (Jones and Baumgartner, p. 14, 2018). The qualitative approach and the historical summary reinforce the findings of the case study by demonstrating how major events in the food system are related to the policy process and equal rights.

After gathering volumes of primary and secondary sources with relevant content, I coded it for the presence of policy diffusion mechanisms and motivations. Sources of information included mostly documents, newspapers, books, journals, videos, interviews, press releases,

government reports and databases, and general observations. Used here are sources that made reference to the policies at the center of the cases, and those with information about agencies, organizations, individuals, events and other facts associated with the policies. Criteria for the selection of the cases and the historic, critical junctures is based on their relevance to food system policy, their impact on equal rights, and their salience in politics and media. Immigration and public health policy are two of, if not the, most important problems currently facing the food system (Colorado Food Summit, 2020).

Document and content analysis determine what events and policy adoptions demonstrate activation of one or more of the framework's five mechanisms, learning, imitation, normative pressure, competition, and coercion. Its motivations are also sought out: Problem severity, excess (or 'slack') capacity, and obstacles (to policy adoption). I identify policy entrepreneurs and their roles in the policy process. I am able to gauge the frequency of the mechanisms being used and how they relate to equality and civil rights. This study will allow for similar research in the future with larger sample sizes and more empirical results.

Northern Colorado, the geographical region featured in the history and the case study, is an especially valuable setting for this research. Annually, Weld County is in the top-ten nationwide for agricultural production, so it is representative of agricultural regions across the US (Up-State Colorado, 2020). Major media events concerning labor conditions at the JBS Swift Beef plant in Greeley over the past twenty years has made it a national arena for the most pressing debates over issues such as immigration policy, public health policy and racial equality and civil rights. All of these factors combine to make this region a living laboratory and the perfect setting for this case study and its theoretical application. The findings are an accurate barometer of the health of the nation's food system.

Triangulating findings about the three cases with the policy diffusion framework and a history of labor in agriculture indicates that equality in the food system is suffering from civil rights violations that have handicapped it for more than a century. Nonetheless, it also reveals that there is great potential in the policy process to mend injustice by empowering communities at the grassroots. Patterns emerge in the types of mechanisms present, in the ways they are used, and in the impact they have on individuals and communities.

Identifying the policy diffusion mechanisms in the case study tells us about the contemporary nature of the policymaking process. But, to truly illustrate the causal forces that explain inequality stemming from food system related policy, an in-depth historical analysis is also necessary. Kato (2003) argues that policy diffusion is driven by the past as much as by the present, and uses the term "lock-in" to reference a suboptimal and inelastic status quo that may, or may not, be changed by a series of policy diffusions. "In historical lock-in, an inferior technology is diffused at the expense of a superior one… the outcome remains inefficient and irremediable" (Kato, p. 2003). In other words, new technologies, or in this case policies, aren't adopted despite being optimal. The historical analysis and the case study trace the contest over, and diffusion of, policies that either sustain or erode inequality in the food system. In this case, those policies that maintain inequality are clearly the suboptimal ones. To expose examples of historical lock-in, institutionalized racism in the food system needs to be tied to certain critical junctures from the 20th century.

According to Capoccia (2016), critical junctures are periods or events that disrupt longstanding institutions or norms to create new ones, and "have long term legacies." So, as the diffusion framework maps policy diffusions between government agencies, the process tracing illustrates the evolution of these policy problems from the 20th century to the 21st century.

Because historical institutionalism is often preoccupied with critical junctures to understand when, why and how institutions change, its analytical approaches like process tracing are especially helpful tools for explaining the evolution of food system policy. The *Oxford Handbook of Historical Institutionalism* describes it as one method of using historical narratives "to identify the mechanisms that shaped political contestation over time" (Forietos et al., 2016). And, Beach (2017) echoes the value of process tracing specifically in the context of policy diffusion studies saying that, "process tracing methods and an emphasis on causal mechanisms have proven fruitful in advancing an understanding of both policy diffusion and social development" (Beach, p. 47, 2017). Though the degree to which history decides the present and the future may not be apparent from first glance, patrons of historic institutionalism beg that we not take for granted the study of political history (Forietos et al., 2016; Capoccia, 2016).

From roughly 1910 to 1920, the Mexican Revolution pushed millions to the US as they fled war and poverty, creating a lasting tradition of migrant labor. The Bracero Program (1942-1963) took advantage of that labor by formalizing the recruitment of migrants through an agreement with the Mexican government, again accelerating the migration patterns. Then, the Chicano Movement (1950s-1970s) emerged as the most formidable social movement in protest of the inhumane treatment of migrant workers by food growers participating in the Bracero Program. These moments shaped the modern labor pool in food processing and entangled the issues of immigration and civil rights. The historical background acts as a foundation for the process tracing exercise before the diffusion framework is used to analyze the cases. The policies and problems in the case study were not created overnight and the push for equal rights didn't end with the Chicano Movement.

The policy adoptions and other events in the cases are products of historical lock-in, stemming from these 20th century critical junctures. So called "push and pull" immigration factors in Mexico and the US like the Mexican Revolution and the Bracero Program set the US food system on a course defined by suboptimal welfare policies for immigrant farm workers in spite of their essential contributions. A lack of provisions in the Bracero Program for working and living conditions coupled with racial segregation in the US severely restricted the access that migrant workers had to basic necessities and other social and economic opportunities. But, the chance to work in the US was still preferable to many of these early migrants who were escaping years of violence and abject poverty in Mexico after the Mexican American War and the Mexican Revolution (Gutiérrez, p. 59, 2013). This combination of events marks the beginning of a historical lock-in, in which the issues of immigration, public health, and civil rights collide in the food system.

And yet, just because a policy or institution has the quality of being locked in as the status quo, that does not make it immune to change. The policy diffusion process is often carried out in an attempt to replace suboptimal policies with more "appropriate" ones and break a course of historical lock-in. Dolowitz (1997) says, "a primary cause of policy diffusion is dissatisfaction with the status quo" (Beach, p. 26, 2012). Although this study emphasizes the longevity of inequality stemming from critical junctures in the 20th C. and sustained by more recent policies, it also seeks to highlight that institutionalized racism in the food system can be contested through the policy diffusion process.

Chapter 3 - Process Tracing, Critical Junctures and Historical Analysis

History is essential to answering the research question by explaining how immigration, public health, and civil rights have come to overlap one another in the context of the food system. This historical analysis narrates and traces three critical junctures from the 20th century to the present which have pushed and pulled migrant workers from Mexico to the US, creating traditional, word-of-mouth networks of immigrant laborers lasting into the 21st century. They also set the US on a trajectory whereby US food growers and processors became reliant upon immigration policies that either provided authorized migrant workers, or which do not enforce against the hiring and exploitation of unauthorized workers. Organized resistance to the mistreatment of agricultural labor and racial segregation has confronted such injustice since the 1950s in the form of the Chicano Movement and the United Farm Workers Union (UFW).

Much recent scholarship on inequality in food processing has posited that exploitive working and living conditions are results of the US supply chain model being globalized through free trade agreements in the late 20th century (Shiva, 2016; Carolan; 2013). They largely ignore that inequality within America's domestic food system is the product of a much longer and even more turbulent history of civil rights abuses among migrant workers. This scholarship devoted to the topic of inequality in the global food system has become prominent despite misrepresenting historic events and causal mechanisms. The literature does accurately take a global view of the issue, and is correct in asserting that the American, industrialized system of agriculture became a model adopted internationally during the so-called Green Revolution of the 1950s and 1960s (Shiva, 2016; Carolan, 2013). Inequality worldwide, they say, is a result of globalizing American-styled food processing (Shiva, 2016). But, by narrowly considering only

how the American system has been modeled and abused in Mexico, India, Latin America, Asia, and Africa, those studies fail to consider what is, and has been, driving inequality within the American system domestically. By taking a second look at history we find that the export of American agriculture worldwide would've been inconceivable without the continued import of immigrant labor to the US, and this reality has significant and enduring implications for equality.

In contrast, this historical analysis summarizes the actual key events and policies responsible for structural inequality in the food system today. The original factors pushing and pulling immigrants to work in the US, such as the Mexican Revolution and the Bracero Program, explain how by 1950 the Americana food system was sustained by informal networks and immigration policies that tolerated exploitative working and living conditions that deeply embedded lasting inequality within immigrant communities. Then, the case study brings us to the 21st century with a careful and up-close look at how the policy process has been instrumental in either protecting or violating the rights of the food system's immigrant laborers over the past twenty years, giving a comparative view of how much they have, or have not, improved since the 20th century.

Shiva (2016) and Carolan (2013) point a finger at the 1994 North American Free Trade Agreement (NAFTA) for unsettling the Mexican maize sector and driving millions of rural Mexican residents into cities and the US looking for work and a new life, predominantly in agriculture (Shiva, p.100, 2016). However, the vast majority of Mexican immigration to the US occurred between 1970 and 2010. In 2010, the rate of Mexican immigration to the US was overtaken by the rate of individuals returning to Mexico from the US.[3] If NAFTA led to such a

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[3] Migration Policy Institute. Migration rates between US and Mexico since 1870.
https://www.migrationpolicy.org/programs/data-hub/charts/mexican-born-population-over-time?width=1000&height=850&iframe=true.

wave of migration, then the mechanism by which it displaced people was likely neutralized by 2010, and whatever caused Mexican immigration to the US to spike in the 1970s predates any liberal reforms of the 1990s.

NAFTA was not the original impetus for the mass migration of Mexican labor to the U.S. Rather, the original cause goes back much further. The Mexican-American War (1846-1848) and the Mexican Revolution (1910-1920) uprooted millions and, in the late 1800s, waves of Mexican nationals were migrating to the US to work on railroads, in mines, and on farms (Deutsch, 1987). In 1943, the US and Mexico formally agreed to the Bracero Program; its terms granted US work visas to a set number of Mexican nationals to participate in agricultural labor. Producers in the US were facing labor shortages caused by World War II, and Mexico stood to gain from remittances. Both economies benefitted from the economic partnership (Bracero History Archive, 2019). Even before the Bracero Program, Mexican migrants traveled from farm to farm in the U.S. in constant search of labor beginning at the turn of the twentieth century.

The Bracero Program, also referred to as Public Law 78 (1951), institutionalized what was an informal practice of recruiting farm labor from Mexico from the early 1900s (Kim, 2017). Even after its repeal in 1963, it had locked American immigration policy into a relationship with issues of agricultural labor. Immigration laws were, thereafter, largely determined by the needs of growers and processors. Recruiting of Hispanic and Mexican labor to work the fields had begun in northern Colorado in 1916. It was the catalyst of most of the immigration to come, and the beginning of institutional norms that were uninterrupted until the early 2000s.

Through the twentieth century, tens of thousands of Mexican and Hispanic families migrated annually to the northern Colorado region to plant, tend, and harvest the sugar beet

fields on behalf of farmers holding contracts with Great Western Sugar factories.[4] Often

forbidden from living and shopping within city limits by segregation laws and codes, migrants

lived in tents and shacks while building adobe homes in "Spanish Colonies" near the fields.

Multiple families occupied one room adobes with little else but a wood stove and a dirt floor

(Brooks, 2002). Since the Bracero Program especially, US immigration policy has been crafted

with special consideration for the labor needs of domestic food growers and processors, but not

necessarily for the laborers themselves. The unequal nature of this relationship derived from the

Bracero Program persists today, evidenced by Covid-19 outbreaks and food deserts that

disproportionately affect immigrant communities. Like historical artifacts, these are tangible

remnants of de jure segregation. But this history has also been marked by formidable

challengers of the status quo like the United Farm Workers (UFW), the Chicano Movement,

Cesar Chavez and Dolores Huerta among many others.

Driven by political disenfranchisement and miserable working and living conditions in

California's fields, Hispanic and immigrant laborers began organizing politically in the 1950s

and mobilized campaigns to consolidate power in the policymaking process (Solis, 2019). Like

the Covid-19 outbreaks and food deserts we see in today's food system, agricultural workers and

their families in the 20th century were highly susceptible to dysentery and other severe illness.

They were also discouraged from voting and organizing politically. Local activist and Greeley,

Colorado school board member Rhonda Solis interviewed founding co-leader of the Chicano

Movement and the United Farm Workers (UFW), Dolores Huerta, about her experiences in a

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[4] Great Western Sugar, founded in 1900 by Charles Boettcher, pioneered industrialized sugar processing in northern Colorado and the Great Plains region. Sugar processing plants dotted the region, dominated local economies, and demanded the labor of thousands of migrant, Hispanic planters and harvesters in sugar beet fields until the early 2000s. Great Western Sugar's practice of recruiting Mexican migrant labor set a precedent for the Bracero Program. Western Sugar Cooperative. 2018. History-Great Western Sugar. https://www.westernsugar.com/who-we-are/history/

podcast. Huerta emphasized that influencing politics and policy change through grassroots organizing was atop the movement's agenda. Huerta said, "Anytime that we want to change policies, we have to get the people affected involved and we have to get them engaged" (Solis, 2019). She credited their mobilization with the erasure of Public Law 78, the Bracero Program, in 1963 (Solis, 2019). The end of the Bracero Program roughly indicates the beginning of the Chicano Movement, the third critical juncture. Although exploitive labor practices persisted, the movement's success in ending the Bracero Program shocked the system and gave generations of activists to come confidence to fight exploitive conditions and policies (Kim, 2017).

In spite of immigration policies being deliberately tailored to labor demands, and even amidst the modern work visa system, food processors have frequently turned to "undocumented" sources of foreign labor to cut costs and fill labor shortages. The Bracero Program had the "effect of increasing both sanctioned and unsanctioned migration to the US from Mexico. By reinforcing communication networks between contract workers and their friends and families in their places of origin in Mexico, increasing numbers of Mexicans were able to gain reliable knowledge about labor market conditions, employment opportunities, and migration routes" (Gutiérrez, p. 59, 2013). The end of the Bracero Program was not the end of the relationship between farmers and foreign national workers.

Because undocumented immigrants lack citizenship or residency status and are not authorized to work in the US, they are not guaranteed any of the usual protections or benefits from employers. This encourages employers to undermine and disregard union demands. The practice of hiring undocumented labor is widespread across the food system and many other sectors (Patmore and Stromquist, 2018). Regardless of citizenship status, immigrant workers have always been the backbone of the food system.

Figure 1 An adobe home from Greeley's Spanish Colony at the Centennial Village Museum (Brooks, 2002).

Figure 2 A family harvests the sugar beet fields outside of Greeley, CO. Circa 1920. (Brooks, 2002).

The development of the heavily industrialized, American food system since the second half of the 19th century would have never been possible were it not for the waves of immigrants from Asia, Europe and Latin America. Labor and immigration policy have grown together through decades of policies that regulate flows of immigrants according to farm labor needs. When immigration policy became slow to adapt to the needs of immigrants and farmers alike, then undocumented immigration filled the role of the early migrants.

Undocumented labor in food and agriculture was lessened in the early 2000s when the Department of Homeland Security created a new program called Secure Communities to crack down on undocumented labor in food processing facilities, and since then refugees from Somalia, Kenya, and Myanmar have been increasingly recruited to work in them. Still, Latin American immigrants represent the bulk of the food processing labor force in the US (Kammer, 2009). Even after large meat processors shifted their dependence from undocumented workers to

refugees, and after organized labor movements, the legacy of inequality from the Bracero Program and systemic racism lingers today. Neighborhoods that have historically been home to Latino agricultural workers are strained by inconsistent, unequal access to food, which is formally recognized by the US Department of Agriculture as an affront to civil rights (Gallagher, 2019). It's no coincidence that deadly Covid-19 outbreaks have stricken the same demographics that suffered from the Bracero Program's exploitations the most. Low wages and limited benefits have been compounded by decades of de jure and de facto segregation, creating lasting, structural inequality in these communities. This brings us to the case study, which begins with a summary of how immigration policy in the 21st century has created new challenges to immigrant workers in food processing by jeopardizing their civil rights.

Chapter 4 - Case Study

Case 1: Secure Communities Immigration Policy

When the UFW successfully ended the Bracero Program in 1963, a vacuum was left in that area of immigration policy. Agricultural employers returned to informal, word-of-mouth networks to recruit undocumented, migrant workers from Mexico (Gutiérrez, p. 59, 2013). This was complemented by the lax enforcement of immigration laws by government agencies which sustained a low-cost labor pool until 2001. The September 11th terrorist attacks were a major, critical juncture affecting that policy norm when it inspired the creation of agencies like the Department of Homeland Security (DHS) and Immigration and Customs Enforcement (ICE), and a stricter enforcement policy targeted at the deportation of undocumented workers, called Secure Communities. The 9/11 attacks were incorporated into political rhetoric that was used as leverage in the creation of these new agencies, but was also responsible for "blurring the line" between immigrants, undocumented immigrants, and terrorists, creating a "nativist backlash," according to Romero (2006). This first case uses policy diffusion to explain the moment when undocumented labor went from being an economic norm to an issue of national security.

In 2006, ICE targeted undocumented workers in the meatpacking sector and staged the largest workplace raid in the history of the US at beef plants in Greeley, CO and across the US. Although there was a measurable decrease in unauthorized labor afterward, Secure Communities was suspended by the DHS in 2014 because it had become a civil rights liability and many units of government quit participating (AP Wire, 2014). Even as exploitive an institution as undocumented labor is, Secure Communities was as much a threat to civil rights because it was

found out to have encouraged racial profiling, the arrest and deportation of low-level offenders (e.g., traffic tickets), and the separation of families.

First, it is important to recall some principles of policy diffusion from the literature review in Chapter Two. The diffusion mechanisms of learning and coercion are identified the most frequently in the cases. Coercion is expressed in the form of top-down mandates from the federal government to which localities and states had to respond. As Berry and Berry (2018) assert, mandates are a common vehicle for coercive policy diffusion. To achieve diffusion by coercion, "the national government can simply mandate certain activities by states … or the Supreme Court can make rulings that constrain state policy choices (Hoekstra 2009: Hinkle 2015)" (P.259). And, lastly, current literature on the competition mechanism refers mostly to instances of economic competition between cities and states, arguing that jurisdictions will compete to adopt policies that give them some sort of economic edge over a neighboring, rival jurisdiction. The policy diffusion literature uses the competition mechanism strictly in reference to the economic arms race between jurisdictions that neighbor each other geographically, and it does not consider competition as something that may occur between units of government with non-geographic jurisdictions (Berry and Berry, p. 259, 2018; Gilardi and Wasserfallen, 2017). But, impasses over policy between agencies not based on geography do occur, as bared in this case study.

In the course of this first case, an initial series of policy adoptions diffuse from the top down as the Department of Homeland Security coerced state and local agencies to create protocol that fit the mandates of its Secure Communities policy. Specifically, it demanded that state and local law enforcement make it their own policy to report any undocumented immigrants whom they contacted. Some agencies took well to the policy, but others eventually contested it

by declining to enforce it. After lower-level agencies and courts began rejecting it, the DHS revised Secure Communities in 2014, renaming it the Priority Enforcement Program (PEP), and repurposed it to focus deportation efforts strictly on individuals with violent and other felony, criminal convictions[5]. After allowing and even encouraging reliance on immigrant farm labor (documented or not) for decades, the federal government rejected this precedent after the September 11th attacks on the World Trade Center (Chishti and Bergeron, 2011). ICE says the Secure Communities enforcement policy was implemented in 2008,[6] but its mandates and programs were actually being rolled out as early as 2002 when the Department of Homeland Security was created (Aldana, 2008).

The post 9/11 approach to immigration policy also criminalized undocumented immigration, whereas before it had been treated as a civil offense. In United States Vs. Martinez-Fuerte (1976) the US Supreme Court considered the Fourth amendment (prohibiting unreasonable search and seizure) in cases involving immigration. One "explanation for this Fourth amendment exceptionalism is the court's early treatment of immigration as a civil as opposed to criminal enforcement" said a contributor to University California Davis Law Review (Aldana, p. 1091, 2008). The aggressive Secure Communities enforcement style was an overt denial of the precedent set by US V. Martinez-Fuerte and a 180° turn from the previous century's paradigm. "Since 2002, DHS has made inside-the-border enforcement of immigration a priority, particularly targeting undocumented workers," (Aldana, p. 1084, 2008). In 2006, Operation Wagon Train commenced as the largest workplace raid in US history, targeted food processing facilities including the Swift and Co. Beef plant in Greeley, CO (Kammer, 2009).

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[5] Ibid.
[6] ICE. Overview – Secure Communities. https://www.ice.gov/secure-communities#a1

Operation Wagon Train was a militaristic raid conducted by ICE, and caused irreparable damage to immigrant communities and the civil rights of workers, striking another blow to equality in the food system. The raid revealed a double standard in Secure Communities' enforcement strategy. The press release stated that the only targets of the raid were undocumented immigrants who had stolen social security numbers from citizens to get jobs in the US. Arrested and detained were 1,297 immigrants on "administrative" (non-criminal) charges, and 274 on criminal charges. Among them were natural born US citizens. It is also been reported that Swift and Co. wittingly and regularly hired undocumented immigrants. Nevertheless, none of Swift's management level staff was criminally charged for fraudulent hiring practices (Kammer, 2009).

The practice of hiring undocumented labor in the Greeley meatpacking facility goes back in time well beyond 2006. Undocumented labor allowed successive owners of the facility to skirt union demands and save on labor costs. According to Steve Mize, a longtime grocery store owner in Greeley, "It's really just accepted, the immigrant workers and the illegal immigrants. And why? Because they are needed. We know it exists; it's just an ignored factor. It's not an argument; it just is." The 2006 raid "brought attention to a culture in Greeley where illegal immigrants are accepted, and depended on" (Aguilera and Griffin, 2016). Figure 3 illustrates what precipitated the shift to undocumented labor made by employers in the area. The meatpacking plant's dependence on undocumented immigrants grew exponentially when the Local No. 641 led strikes in 1979 for better wages and forced the original owners of the plant to close in 1980. In order to reopen, the owners turned to undocumented labor, quelling the union demands by replacing their members with migrant, Latin American workers who were not in a

position to bargain because of language barriers and the transient nature of migrant work (Patmore and Stromquist, 2018).
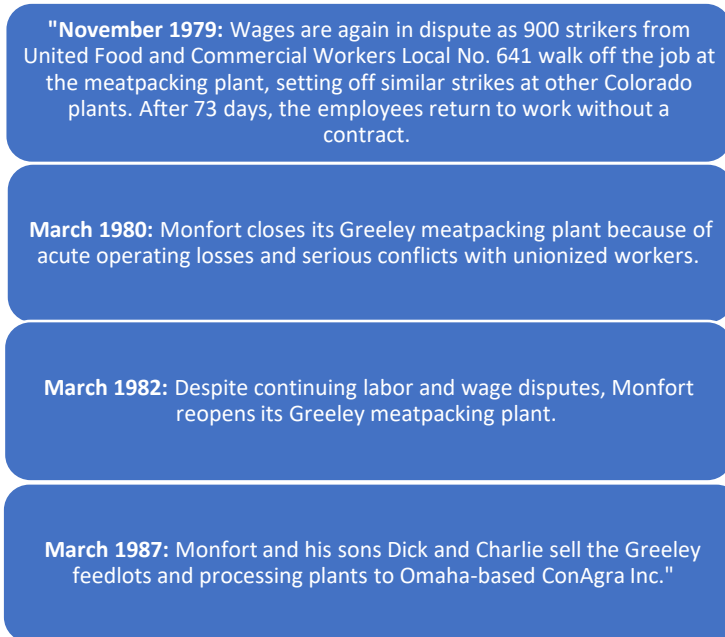

"**November 1979:** Wages are again in dispute as 900 strikers from United Food and Commercial Workers Local No. 641 walk off the job at the meatpacking plant, setting off similar strikes at other Colorado plants. After 73 days, the employees return to work without a contract.

March 1980: Monfort closes its Greeley meatpacking plant because of acute operating losses and serious conflicts with unionized workers.

March 1982: Despite continuing labor and wage disputes, Monfort reopens its Greeley meatpacking plant.

March 1987: Monfort and his sons Dick and Charlie sell the Greeley feedlots and processing plants to Omaha-based ConAgra Inc."

Figure 3 Aguilera, Elizabeth and Greg Griffin. 5/7/2016. "Weld's Secret Broke Open." Denver Post. This sequence of events demonstrates a shift to undocumented labor at the Monfort meat plant in the 1980s as a way to circumvent demands for better pay.

Monfort and the industry at large sustained profit margins by undermining unions, safety regulations and increased wages through the hiring of undocumented workers who had little to no bargaining power. In Monfort's case, ownership resisted the union demands not just to maintain profit margins but because it simply could not afford to raise wages. After the strike, the plant relied on undocumented workers just to meet their operating costs and stay open. The statement below from the *Great Plains Encyclopedia* acts as corroborating evidence for the fact that the strikes at Monfort in the late 1970s and early 1980s forced the closure of the plant and was only able to reopen with undocumented labor:

"Exploitation of Mexican and Mexican American meatpacking workers was not limited to Nebraska. In Greeley, Colorado, similar conditions existed. Following the temporary shutdown of a Monfort meatpacking plant there in 1980, the local meatpackers' union disbanded, giving Monfort a free hand in its treatment of the new workers the company hired when it reopened in 1982. Monfort started by filling its factories with Mexican and Central and South American workers. Working conditions were no better than at the meatpacking plants in Nebraska, and Greeley city officials were reluctant to take action against Monfort's exploitation of its workers because the local economy relied heavily on the meatpacking industry" (Wishart, 2011).

After the plant reopened in 1982 and was sold in 1987, undocumented labor became more and more prevalent until 2006. It was reported that at the time of the 2006 raid, 23% of Swift & Co.'s workforce was undocumented. All workers in the plant, regardless of legal status, were earning 45% less in wages than they were in 1980 (Kammer, 2009).

Local officials were reluctant to intervene (at least publicly) in part because immigration is a federal policy issue, but also because of the local economy's dependence on undocumented labor. Another reason they hesitated to address the immigration issue was due to how politically contentious it was. Soon after the 2006 ICE raid at the Greeley Swift & Co. facility, the city's then mayor Tom Selders testified to Congress in Washington D.C. about the fallout from the raid, and vehemently opposed its methods. Selders said in his testimony that Secure Communities was "a failed federal policy. We can't deport 12 million people. There's not the political will. In Colorado, what would that do to our tourist industry? What would that do to our agriculture?" (Olinger, 2008). Selders had won 65% of the vote as a Republican in 2005. After denouncing the raid to Congress, he received only 39% of the vote in the next election. Opponents lambasted him as being weak-on-crime and he lost to a candidate with a tough-on-immigrants platform (Olinger, 2008). The nativist backlash caused by 9/11 and the creation of Secure Communities had successfully reframed undocumented immigration from an economic issue to one of national security, religion, and race (Romero, 2006).

After 2006, DHS and ICE used coercion as a mechanism to diffuse the Secure Communities policy to local agencies. Some law enforcement agencies embraced the policy while others were more reluctant. In Greeley, the Weld County, CO Sheriff and District Attorney's office enthusiastically implemented Secure Communities in 2008. As a result, "Operation Numbers Game" was a local campaign that very closely imitated ICE's 2006 Operation Wagon Train. On October 17, 2008 the county sheriff raided Amalia's Tax and Translation Services in Greeley and confiscated the tax records of over 1,300 suspected undocumented immigrants (Frosch, 2009). Just as ICE had claimed about Operation Wagon Train in 2006, Weld DA Ken Buck insisted that Operation Numbers Game was not about immigration, but rather identity theft. Investigators interrogated the business owner, Amalia Cerillo, and indicted around 100 of her clients on charges of buying stolen social security numbers in order to work and file taxes in the US. Others whose records were seized had obtained Individual Taxpayer Identification Numbers (ITINs) from the Internal Revenue Service (IRS) in order to file taxes in lieu of a social security number. Despite filing taxes legally, the raid subjected them to unreasonable search and seizure, and deportation (Frosch, 2009). Immigration raids at the meat plant and at Amalia's demonstrate the diffusion of Secure Communities from the federal to the local level via mechanisms of coercion and imitation.

But by December 2009 the implementation of Secure Communities began to unravel when the Colorado State Supreme Court upheld a ruling from Weld District Judge James Hartmann that the tax records were seized illegally by the district attorney. The Supreme Court wrote that the DA had failed to establish probable cause of identity theft, and had violated the Fourth amendment rights of the record holders, considering tax records are confidential (Whaley, 2009). The decision marked a return to the precedent set in US V Martinez-Fuerte (1976) in its

consideration of the Fourth amendment in immigration related cases, and started a second stream of policy diffusion.

DHS's and ICE's use of the coercive mechanism[7] mandating compliance/adoption of Secure Communities at lower levels of government, such as police departments, backfired. After the Colorado court ruling on Operation Numbers Game, law enforcement agencies in several states,discontinued compliance with Secure Communities. During the Supreme Court trial, the Denver Post reported that, "prosecutors around the country have been watching the [Numbers Game] case closely, reportedly the first in the United States in which law enforcement sought to use tax returns — generally considered confidential under federal law — to take suspected illegal immigrants to criminal court" (Whaley, 2009). State and local law enforcement agencies across the country had lost faith in Secure Communities by this point and were looking for ways out, so Colorado's ruling on Operation Numbers Game gave them an escape route by reinforcing the previous precedent that had been set by US V. Martinez-Fuerte 1976 (Whaley, 2009).

States and localities competed with DHS to replace Secure Communities. As more agencies in states like Colorado, California and Pennsylvania abandoned Secure Communities, the DHS suspended the policy in 2014, and replaced it with the Priority Enforcement Program (PEP), which was supposed to be less invasive of immigrant communities by only targeting undocumented individuals who were wanted for violent and other serious crimes for deportation. It was also less demanding of state and local law enforcement, cancelling the mandate that they report undocumented individuals in their custody to ICE (AP Wire, 2014).

The early 2000s were a watershed moment for labor in the food system. Upon the creation of the DHS, ICE, and Secure Communities the federal government had gone from

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[7] As policy diffusion framework would refer to them.

overlooking undocumented labor, to mandating law enforcement agencies to report any and all undocumented immigrants they came in contact with. All of those on the receiving end of this paradigm shift, from workers and families to plant management, police departments, judicial courts, and policymakers, were unsettled and forced to adapt (Kammer, 2009).

The highly coercive, invasive, and militarized nature of Secure Communities and Operation Numbers Game eroded trust and drove wedges between law enforcement and immigrant communities. Some of Greeley's Latino and immigrant residents are still dealing with the trauma left by the raids. "The way people have dealt with this is to not talk about it," said Priscilla Falcón, a professor of Latino studies at the University of Northern Colorado. "The issue is still pretty raw. It's still an open wound. We live in a divided community" (Lofholm, 2013). The methods and mechanisms for enforcing Secure Communities are responsible for civil rights abuses and social and cultural damage, providing insight into why it was such a failed policy.

Secure Communities' offshoots like Operation Wagon Train and Operation Numbers Game violated civil rights in at least two instances. Individuals whose tax records were seized at Amalia's were denied protection from unreasonable search and seizure, as were hundreds of verified US residents detained during the 2006 Swift & Co. raid. By the DHS' own admission, the policy enabled racial discrimination and civil rights violations which it used as justification for suspending Secure Communities (DHS, 2011). That recognition is proof of the learning mechanism being activated as a federal agency learned from policy adoptions being made at state and local levels that rejected Secure Communities and made a corresponding policy adoption itself through the Priority Enforcement Program.

Diffusion of Secure Communities may have ended a longstanding policy paradigm tolerant of unauthorized labor, but it did not improve working conditions, nor did it really change the course of the unequal, historical lock-in. By 2008, Greeley based Swift & Co. had been acquired by Brazilian meatpacker JBS, who then established the American subsidiary JBS USA and headquartered it in Greeley.[8] Afterwards, they and their industry peers began to hire sanctioned, refugee workers from Somalia, Kenya, and Myanmar, reducing their reliance on undocumented Latin Americans and rapidly changing the demographics of the labor pool (Kammer, 2009). According to the Los Angeles Times, the Greeley Beef plant raised wages and hired dozens of US citizens and African refugees immediately after the 2006 raid. Industry wide, they say, the portion of undocumented immigrants in the meatpacking workforce dropped from 52% in 2006 to 42% by 2008 (Groves and Tareen, 2020). Dependence on foreign labor persisted as much as before, but a lack of residency/citizenship status among workers was no longer the primary mechanism for exploitation.

Case 2: Policy Diffusion and Covid-19 in Meatpacking

Recent events in food processing like Covid-19 outbreaks show that just because large employers broke from the decades long practice of exploiting undocumented workers, the health and safety of working conditions did not necessarily improve. With tens of thousands of meatpacking employees having been infected nationwide, and hundreds more dead from Covid-19 in just one year, concerns about civil rights violations are being raised (Clyburn, 2021). Illustrated in this case is how new policy was diffused to respond to some of the nation's worst Covid-19 outbreaks threatening food supply chains.

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[8] JBS. 2020. About JBS: History. https://jbssa.com/about/history/

Disproportionate numbers of infections and deaths among workers of color at the JBS Greeley meatpacking plant in northern Colorado has signaled to Congress and other NGOs a potential case of civil rights infractions (Newell and Sinclair, 7/2020). JBS USA and other meatpackers like Smithfield have shouldered most of the blame for civil rights violations related to Covid-19 spread in their plants. But this analysis of the policymaking process in response to the outbreaks, using the diffusion framework, suggests that several government entities are just as culpable. In the government's response to Covid-19 outbreaks at food processing facilities, an initial stream of policy adoptions between Weld County and the State of Colorado meant to slow meat production and the spread of the virus collided with, and was overwhelmed by, a second stream or series of opposing policy adoptions designed by the White House and the CDC meant to keep the facilities operating at full capacity.

JBS's Greeley facility was the first Covid-19 outbreak at a meat plant to get national media and political attention, so it was the catalyst for much of the policy diffusion nationwide (Maddow, 5/1/2020). The JBS facility was regarded essential to national security and remained open. At first, local, state, and union officials were generally reluctant to close the plant. The JBS Greeley site is one of the nation's largest meatpacking plants, and more than 3,400 workers depend on it for income. "Shutting down one plant, even for a few weeks, is like closing an airport hub. It backs up hog and beef production across the country, crushes prices paid to farmers and eventually leads to months of meat shortages" (Corkery and Yaffe-Bellany, 2020). But, after the second death of a union member from Covid-19, United Food and Commercial Workers (UFCW) #7 President Kim Cordova demanded that the plant be closed for a minimum of one week. An April 10 letter to the governor requested action on the part of the state to contain the outbreak by using its authority to close the plant and deep clean it, provide testing

and paid leave for all employees, and healthcare for infected/potentially infected workers before the plant's reopening. The State of Colorado subsequently met most of the union demands the same day via a CDPHE order (Cordova, 2020).

In so doing, CDPHE was adopting the policy recommendations of an April 4 order issued to the JBS facility by the WCDPHE. The county's initial order was based on findings of an investigation from a week prior to survey safety conditions after numerous employees tested positive for Covid-19 and nearly 1000 union members walked off the job demanding more safety precautions (Bunge, 2020)[9]. The April 4 order mandated several precautions on behalf of worker safety including plexiglass between workspaces, personal protective equipment, distancing, and paid sick leave (Navarro, 2020).

After the CDPHE order was issued, JBS announced April 10 (5:45pm) that it agreed to close the Greeley facility over the Easter holiday, through the following Tuesday, to clean the plant and test all employees[10]. This initial outcome was the result of a bottom-up, policy diffusion process, wherein the CDPHE adopted the WCDPHE's policy response to the Covid-19 outbreak at JBS. This policy adoption was done in the spirit of collaboration, or learning, to use the language of the diffusion literature. It was also meant to ensure the compliance of JBS by reinforcing the county's authority to regulate conditions in the plant. Still, JBS was able to avoid fully complying with the regulations, due in part to the federal government's response.

Five hours earlier the plant had been thrust into the national spotlight when President Trump made reference to it in the daily White House briefing (2:25pm) on the pandemic. This

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[9] Workers, families and the local union are alleging a lack of preparedness and failure to cooperate on the part of JBS in response to the outbreak. Some employees and family speaking out are concealing their identities for fear of retaliation by management. Bunge, Jacob. 4/6/2020. "Coronavirus Hits Meat Plants as Some Workers Get Sick, others Stay at Home." Wall Street Journal.
[10] JBS USA. 4/10/2020. "JBS USA Partners with White House, Governor Polis and Senator Gardner to Provide Free Covid-19 Tests for Greeley Beef Team Members." Press Release. https://jbssa.com/about/news/2020/04-10/#.Xpny1S3MyGR

marked the beginning of an opposing effort to keep meat plants at full capacity. After being asked by a journalist if there was any "priority to get testing at food processing plants all across the country," the president alluded to the situation at JBS and implied that a policy of mass Covid-19 testing would be undertaken in the case of an outbreak, like at JBS, but gave no specifics about a nationwide policy to test workers. The president said:

> "You're asking that because of what happened in Denver, because in Denver I've never seen – I said what's going on? You've got this one spike… this just happened I just saw it this morning…I think we're doing well… they've got it under control. But yeah that'd be a case where you'd do some very big testing."[11]

President Trump never specified exactly who or what he was referring to when he said "they" have "it" under control. Nonetheless the national media quickly deciphered the "Denver" incident as the Covid-19 outbreak at the Greeley JBS facility. Despite promising that a policy to do mass testing at food processing facilities was already in place, local news reported that the plan to test all employees was abruptly cancelled on April 12, Easter Sunday, as it quickly turned into a logistical nightmare (Bradbury, 2020).

After the state mandated that the plant close, be cleaned, and its workers tested, that initial set of policy adoptions began to face resistance from federal agencies like the CDC and from the White House. Federal agencies eroded the initial policy adoptions that were diffused from the WCDPHE to the CDPHE and, likely, other states. First, the CDC coerced the CDPHE and the WCDPHE into relaxing their guidelines for asymptomatic workers by threatening to withhold federal assistance. The day after the April 10 order, in an email exchange between CDPHE director Jill Ryan and WCDPHE director Mark Wallace, Ryan informed Wallace that she had been asked by CDC director Robert Redfield to relax the mandates in its order,

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[11] White House. 4/10/2020. "President Trump discusses learning about the COVID-19 outbreak at JBS meatpacking plant." YouTube. https://www.youtube.com/watch?v=RSLCStmAxa4

specifically to allow exposed but asymptomatic individuals to continue working. Ryan asked Wallace if he "was okay with that." Ryan told Wallace that the CDC had implied it would cutback Covid-19 assistance to Colorado if they did not appease the request, which they both did (Fendt, 2020).

On April 24, Weld County allowed the JBS plant to reopen without completing implementation of the state's mandates, and against the advice of its own director of public health, Dr. Wallace, whom retired immediately thereafter (Daly, 5/22/2020). Despite the fact that the April 10 order mandated that JBS work with the Colorado Department of Labor to distribute benefit assistance to impacted employees, Reuters reported that JBS USA was denying worker compensation claims for those who fell ill from Covid-19, and for those who died. A response written by JBS to a compensation claim from the family of Saul Sanchez, the first JBS employee in Greeley to die of Covid-19, simply said his death was "not work related," and did not elaborate any further (Hals and Polansek, 9/29/2020). It's also being alleged in two, signed affidavits from medical contractors hired by JBS to conduct testing that workers were charged $100 per test and that even those who displayed symptoms were encouraged by management to go to work without being tested (Meade, 10/6/2020). Clearly, the April 10 order from the State of Colorado did not carry weight with JBS USA management.

Four days after Weld County reversed course on its closure mandate, President Trump activated the Defense Production Act, nationalizing all beef and poultry facilities, a decision that disallowed state and local agencies from shutting down meat processors with Covid-19 outbreaks and satisfied the demands of the meatpacking lobby (Grabell and Yeung, 9/14/2020). A copy of the executive order from the White House justified the decision by saying that the closure of meat plants was "inconsistent" with the policies of the CDC, the Occupational Safety and Hazard

Administration (OSHA), and the Department of Labor. "Such closures," it said, "threaten the continued functioning of the national meat and poultry supply chain, undermining critical infrastructure during the national emergency" (White House, 4/2020). However, the order makes no reference to the threats posed by outbreaks to the health of the essential workers staffing the plants.

What defines the second series of policy adoptions the most is the oversized role that the meatpacking lobby played in the diffusion process by having a monopoly on the flow of information, excluding other stakeholders and opinions from consideration. Rather than acting as arbiters of the policy contest, federal officials and agencies heavily favored the interest of the meatpacking lobby. FOIA requests filed by ProPublica for relevant correspondence between the two parties confirms the federal government's deference to the industry in its decision making. Former OSHA investigator Debbie Berkowitz said to USA Today that "the [meatpacking] industry ran to the White House," and demanded to "stay open and have USDA intimidate [state and local] health departments" (Chadde et al., 9/15/2020). On top of the intimidating coercion pressed against local and state health officials, the federal government made policy adoptions that were carbon copies of language sent to them by the meatpacking lobby, in particular Trump's issuing of the Defense Production Act nationalizing meatpackers (Grabell and Yeung, 9/14/2020).

James Brudney, from the Fordham Law School, suggested that it is standard practice for industry to send drafts of legislative language to an agency, something the policy diffusion framework's learning mechanism confirms. Normally, though, he said "it wouldn't just sail through because there would be other parties involved. That seems not to have happened here"

(Chadde et al., 9/15/2020).   UFCW#7, the union representing JBS Greeley workers, says it was never consulted by a federal agency or by JBS (Grabell and Yeung, 9/14/2020).

Perhaps what is most tragic about the Covid-19 outbreaks in food processing facilities is that they were, most likely, preventable according to another ProPublica investigation.   In the early 2000's, personnel like John Hoffman at the Department of Homeland Security's food and agriculture sector were tasked with developing an emergency plan for food processing facilities in the case of a pandemic. Hoffman said that Covid-19 outbreaks have "unfolded pretty much as the pandemic plan suggested it would" (Grabell and Yeung, 8/2020). JBS and other major companies have argued that their outbreaks were inevitable and unforeseeable, but the meatpacking industry as a whole declined to implement the precautions outlined in the government's plan. A JBS Supervisor told ProPublica that while they had trained for natural disasters like tornadoes and floods, they "don't remember ever talking about a pandemic" (Grabell and Yeung, 8/2020). Implementation of the DHS preparedness plans would have most likely reduced the case counts and deaths from Covid-19 in the JBS Greeley plant and others.

The Occupational Safety and Hazard Administration (OSHA) levied a $15,000 fine against JBS for two safety violations that support the allegations made against it in a civil rights complaint filed by several workers' unions. OSHA found that JBS 1) failed "to provide a workplace free from recognized hazards that can cause death or serious harm," and 2) "also failed to provide an authorized employee representative with injury and illness logs in a timely manner following OSHA's May 2020 inspection" (OSHA, 2020). The civil rights complaint sent to the US Department of Agriculture for investigation goes even further to say that these inactions impacted their Black, Latino, and Asian workers disparately (Newell and Sinclair, 7/8/2020). OSHA has drawn criticism for levying a rather insignificant fine against the company

whose third quarter 2020 net profits surpassed $574.9 million. But, more important than the amount of the fine is that the allegations can be used as leverage in other cases against meatpackers, such as in a recently formed House subcommittee investigation on the Coronavirus.

Figure 4 Colorado Commissioner of Agriculture Kate Greenberg, left, and Governor Jared Polis, right, hold a press conference (3/7/2021) at the JBS Greeley plant to announce a joint Covid-19 vaccination effort between the state and JBS (Morning Ag Clips, 3/7/2021).

On February 1, 2021 U.S. House Representative James Clyburn sent a letter to JBS USA CEO Andre Nogueira saying that JBS was the subject of an investigation by the House Select Subcommittee on the Coronavirus Crises, concerning the health and safety of their workers during the pandemic. In the letter, Clyburn uses findings from the OSHA investigation and other reports to accuse JBS of refusing "to take basic precautions," and showing "callous disregard for workers' health" (Clyburn, 2021). Clyburn's letter focuses heavily on the outbreak at the company's Greeley, CO plant, regarding it as one of the most egregious failures industrywide (Clyburn, 2021). The letter calls out meatpackers like JBS who were granted waivers by the federal government to maintain full production speed after state and local health departments slowed and stopped production lines. Plants with these waivers, its alleged, were ten times more

likely to experience prolonged Covid-19 outbreaks than those without the waivers (Clyburn, 2021).

Again, competition between stakeholders over control of the policy process occurred in ways not generally understood by existing, policy diffusion literature. The literature has ubiquitously referred to the competition mechanism in a context where regional jurisdictions adopt policies in order to compete economically with their neighbors; e.g., a region adopts a policy to lower taxes on new businesses because it will give them an economic advantage over their neighbor (Berry and Berry, p.259, 2018). Though, in this case study, the federal government's initial policy response to the Covid-19 outbreak at JBS Greeley was done not to give one region an economic advantage over another, but was rather to help one sector of the economy, meatpacking, maintain an economic advantage that was being threatened by policies at state and local levels to close the meat plants.

UFCW#7 President Cordova's partially successful effort to identify policy problems and persuade policymakers at the state level to close the Greeley plant and test all employees pivots on at least two elements of the policy diffusion framework. Her letters to the Governor, county, state, and JBS administration effectively laid out to them the dire need for a coordinated policy response between agencies due to the severity of the problem, as it was a crisis of public health and worker safety. The letters forced the relevant agencies to engage in the learning mechanism as they communicated about the conditions at the facility and what an appropriate response would be. Her rhetoric motivated these agencies to respond and to interact with one another, culminating in a process of policy diffusion, even if it was quickly stunted by the federal government's policy response.

President Trump's use of the Defense Production Act to force meat process to stay open against state and local orders exemplified hard coercion. Another example of hard coercion is in the CDC's request for the CDPHE to relax their mandates or otherwise lose federal assistance. Obstacles to policy innovation and diffusion in this case involve a lack of resources available to conduct mass testing and cleaning, and a lack of cooperation, information sharing and networking on the part of JBS, the White House and federal agencies. Their failure to communicate and collaborate with other stakeholders in a timely manner proved to be a barrier to the learning process between the policy entrepreneurs, and a primary cause of the high rate of infection and death from Covid-19 at its Greeley facility. Despite efforts by the WCDPHE and the State of Colorado to meet the demands of the UFCW#7, resistance coming from JBS, the Weld County Commissioners, the CDC and the White House allowed them to make only limited progress before six workers were dead and hundreds more infected.

This one-sided policymaking process demonstrates how severe the consequences for equality and civil rights can be. By favoring the interests of the meat lobby over all else, the White House, the CDC, and the Weld County Commissioners constricted the flow of information, a crucial element for the effective use of the learning mechanism.

Case 3: Equal Access and Diffusion of the USDA Farm to School Grant

A haunting legacy of the 20th century is the systemic and racial segregation that lingers today, manifested often in the form of food deserts. Low income and minority communities are inordinately afflicted by unequal access to full-service groceries. The US Department of Agriculture considers these areas "food deserts" and recognizes their implications for public health, racial equality and civil rights (Gallagher, NRS 2019). Government has undoubtedly struggled to respond to the abandonment of inner-cities and rural communities by full-service

grocers, but in this case the USDA is taking action against food deserts with its Farm to School Grant program, which the Greeley-Evans School District is a participant in. The grant employs a strategy of connecting school districts to the nearest farms and freshest produce, necessary to make the food system more equal and just. The program's success hinges on the learning mechanism and a collaborative approach by government entities.

Many of the neighborhoods adjacent to the meatpacking plant where the workers and their families live have poverty rates between 20% and 40%.[12] Ironically, although there are several, large food processing facilities in and around these neighborhoods, they are considered "food deserts" since they lack grocers.[13] Before they became food deserts, they had strong relationships with groceries whose owners were residents of their neighborhoods. But the consolidation of independent grocers into national chains eroded the connections grocers had with their neighborhoods and eventually led to widespread closures in inner-cities and low-income areas (Deener, 2017). Within the President Obama Administration's Affordable Car Act (ACA) was money designated for addressing food deserts and school lunch quality. These ACA funds supported the "Let's Move" campaign led by First Lady Michelle Obama to target childhood obesity, and led to the passage of the Healthy Hunger Free Kids Act 2010 which allocated more money and programming for improving school lunch quality.[14]

African American and Latino communities have one-half and one-third, respectively, the access that Caucasians have to full-service grocers and supermarkets. An imbalance in the

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[12] US Census Bureau. 2018. American Community Survey ACS 5-year estimate.
https://www.socialexplorer.com/a9676d974c/explore
[13] The U.S. Department of Agriculture considers a food desert to be a low-income neighborhood or community in which more than 500 people (or more than 33% of the population) live further than one mile (ten miles in rural areas) from a full-service grocer. Convenience stores and fast food restaurants generally compensate for the absence of full-service grocers.
[14] Obama White House. About: Let's Move. White House Archives.
https://letsmove.obamawhitehouse.archives.gov/about

availability of fast-food relative to fresh produce is directly related to higher rates of obesity and diabetes (Gallagher, NRS 2019). Beef hamburgers and sodas are the primary staples of fast food in the US. A single beef patty for a hamburger constitutes 25% of an individual's recommended daily sodium intake and one 12-ounce Coca-Cola beverage has 35 grams of sugar, ten more than the recommended daily intake of 25 grams.[15] Hamburgers, soda-pop, sodium and sugar are at the heart of dietary disease in food deserts.

Over the past thirty years, total menu items offered at fast food chains increased by 226%, with "large mean increases in energy and sodium" and portion sizes (McCrory et al., 2019). These increases were to the detriment of dietary health in the U.S. Excess sodium intake is a significant cause of hypertension, stroke, and cardiovascular disease, and excess sugar is associated with a rising rate of Type 2 Diabetes and obesity. Fast food restaurants are the single largest source of cheap, processed foods low in nutritional value in the U.S., and have been increasingly so since 1986. Their abundance is a primary reason why dietary disease hits food desert residents so hard (McCrory et al., 2019).

Descendants of the early migrant workers from Mexico still live in Greeley's Spanish Colony, and a large immigrant and refugee community has flourished across the east side of the city. Basic necessities that Braceros and undocumented workers lacked such as running water and electricity are much more available now. But, food, the most basic of all, is still scarce in these neighborhoods. A report co-authored by several federal agencies including the Environmental Protection Agency, the US Department of Agriculture, and Center for Disease Control found that while there are more than 60,000 residents on the north and east sides of Greeley where the meatpacking plant is, there are only two full-service grocery stores. On the

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[15] Sugar Science. "How Much is Too Much?" University of California – San Francisco. https://sugarscience.ucsf.edu/the-growing-concern-of-overconsumption.html#.XflfhC3Mx-U

more affluent west side, there are eleven full-service grocers for only 40,000 residents. It also

outlined recommendations for fighting dietary disease in Greeley's food deserts. Several

involved more programming for "local food" venues.[16] They concluded the following after a

tour of the city's east side:

> "Northeast Greeley has faced a problem with limited retail food access since the 2014 closure of the only downtown full-service grocery store … despite being a major agricultural producer, very little of the locally produced food is available to consumers in Greeley, as most of it is channeled through large distributors. As such, the linkages between local producers, vendors and consumers are not robust…although Greeley is almost universally known as an "ag town," local foods do not play a significant role in positive branding and placemaking for the community" (Local Food Local Places, p. 2, 2016).

Unequal access to food in Greeley is one consequence from decades of policies that were

tolerant of racism and indifferent to basic, human needs. However, the third critical juncture in

the historical summary was the Chicano Movement, which ended the Bracero Program and built

a lasting foundation for promoting civil rights in immigrant communities. The Chicano

Movement's resistance to systemic racism is still alive and well on the east side of Greeley. At

Al Frente de Lucha community center, volunteers and youth from the surrounding neighborhood

manage a community garden to fill the void of a full-service grocer, in tribute to local Chicano

activist Ricardo Falcón, murdered in 1972 in New Mexico by a right-wing vigilante (Al Frente

de Lucha, 2020). Though not directly partnered with one another, Greeley-Evans School District

Six is working toward some of the same goals as Al Frente de Lucha, like fighting decades of

systemic racism responsible for the city's food deserts.

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[16] According to the USDA Economic Research Service, local food is that which is entirely produced and sold either within a single state, or within a 400-mile radius. Martinez, Stephen. 12/2/2010. "Varied Interest Drive Growing Popularity of Local Foods." USDA-ERS. https://www.ers.usda.gov/amber-waves/2010/december/varied-interests-drive-growing-popularity-of-local-foods/

Figure 5 Photos of volunteers working the community garden at Al Frente De Lucha in Greeley, CO, 2020 and 2017. http://www.alfrentedelucha.org/community-garden./

By participating in a federal grant, called the Farm to School program, is a promising but underappreciated way in which government policy is addressing the food desert problem. CSU's Extension director and organizer of the Colorado Food Summit said the following about leveraging public resources to fill gaps in food supply chains:

> "I think we actually have a lot of good underutilized programs. I think there's some challenges associated with getting some of those resources … There's funding available. But we don't even submit that many grants in the state and I've tried to get producers with these great projects to submit applications but it's hard to do it, there's some rigidity in the rules, so there's just these sorts of barriers in place to even take advantage of many of the programs that we have" (Jablonski, 4/2019).

The USDA Farm to School Grant is one such example of an underutilized program that could be expanded. The grant awards funds to public school cafeterias on the condition that they use the money to purchase food from local farms and dairies with the intent of stimulating the local economy, and improving the quality of school meals. Farm to school involves: "(1) procurement: local foods are purchased, promoted, and served in the cafeteria or as a snack or taste-test; and (2) education: students participate in education activities related to agriculture,

food, health, or nutrition" (Christensen et al., p. 5, 2017). Reasons why the grant offers so much

potential are that it is more viable than most local food venues since they come with government

funding and without the usual startup costs, and that they also replace highly processed, frozen

foods with fresh, local food improving the quality and nutritional content of school meals on a

daily basis, crucial for growing adolescents (Thilmany et al., 2019).

Northern Colorado's only participant is the Greeley-Evans School District 6 (GESD6).

The district's participation is recognized for its success. All of the district's schools are almost

entirely supplied by fourteen farms in the Greeley area. The district spends around $1million in

grant money annually on local food for its cafeterias, and students at most of the elementary

schools help maintain vegetable gardens and partake in nutritional literacy exercises (Christensen

et al., p. 17, 2017).

Farm to School is overlooked but among the best ways to better reach populations in the

district most at risk. Many GESD6 students don't eat at home on a daily basis, but they do eat at

school. Nearly seventy percent of all students in the district qualify for free and reduced lunch

(Greeley-Evans School District 6, 2019). On average, more than 500 students each year

experience homelessness and hunger. Often, these students eat breakfast and lunch at school as

their only meals of the day.[17] Farm to school boosts the quality of these crucial meals, and

instills nutritional literacy in the students.

GESD6 received its first Farm to School grant in 2008 from the USDA to begin

establishing contracts with local farms and dairies (Velazquez, 2017). By adopting this grant

program, GESD6 and school districts nationwide were imitating other pilot programs

administered by the USDA first in Georgia and Florida and then elsewhere. Technically, two

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[17] McKinney-Vento Education for Homeless Youth and Children Grant School Districts. 2020. BOCES.
https://www.cde.state.co.us/dropoutprevention/mckinneyventosubgranteeprogramoverview.

different pilot programs were being administered by separate offices within the USDA. The

USDA's Agricultural Marketing Services (AMS) office and the Natural Resource Conservation

(NRC) office teamed up with Florida A&M University in 1996 when they connected a

cooperative of African American vegetable growers with local school districts as part of the

Florida, Georgia pilot program. In 1995, a pilot program was implemented in eight states by the

USDA's Food and Nutrition Services office.[18] Both were merged with the creation of the USDA

Farm to School Grant Program as part of the Healthy Hunger Free Kids Act of 2010 (Tropp,

2019).

The roots of the initial 1995 program are nestled deep in collaborative efforts between the

USDA and the US Department of Defense (DoD). The farm to school concept was crystalized

by pressure coming from the White House to improve the quality public school lunches in

combination with USDA initiatives seeking to direct more funding to small scale producers. So,

in 1995, the USDA's Food and Nutrition Services office (FNS) initiated correspondence with the

DoD's Personnel Support Center,[19] which led to a series of meetings and conferences. Through

these discussions the FNS hoped to adopt and imitate logistics of DoD food procurement in

public schools. Because the military's food needs are somewhat similar in size and nature to

those of public schools, and because the military's procurement system was well regarded by the

USDA, then it made for a good model (Tropp, 2019).

There are several significant instances of policy diffusion to be unpacked in this example.

First, in an instance of vertical, top-down policy diffusion, the GESD6 adoption of the Farm to

School Grant Program was motivated in part by problem severity, since well over half the school

district is at an increased risk for dietary disease. The Farm to School Grant Program itself is

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[18] The USDA office responsible for procurement of public-school meals.
[19] DoD Personnel Support Center is responsible for procuring the military's food.

also a mechanism of soft coercion because it fosters policy adoption by incentivizing

jurisdictions with a fiscal reward. Without the grant, a lack of financial resources for healthier

food would present an even larger obstacle to improving school lunch quality.

In the second example, imitation and coercion explain the transfer of the DoD procurement

program into public school pilot studies. Mandates from within the USDA and pressure from the

White House to innovate school lunch policy acted as mechanisms of coercion directed towards

the USDA. Collaboration between the USDA and DoD was then the impetus for a policy

transfer in which the USDA adopted and imitated the DoD's food procurement policies.

Third, the learning mechanism is a function of the Local Food Local Places report conducted by

the USDA, EPA, and CDC. The authors of the report toured food deserts in Greeley, and held

panels with local leaders so as to map the regional food system and make policy

recommendations that included (but were not limited to) upgrades to public infrastructure like

sidewalks and crosswalks to make neighborhoods more traversable; more open and green space

and plots for urban gardening; and a campaign to bring a full-service grocer to the downtown

area (EPA Local Food Local Places, 2016). This exchange of information between local and

federal parties as a way to innovate policy is a prime example of learning in action. Even though

this case demonstrates both an efficient grant program and an effective approach to policy

diffusion, only $5million is allocated for it annually, nationwide (Christensen et al, 2017). So,

while it's effective where it exists, expanded participation in Farm to School is prevented by

financial obstacles to diffusion, something indicative of other similar and underutilized

programs.

Chapter 5 - Conclusion

Blending the methods of the policy diffusion framework with process tracing in this cross-case analysis provides a comprehensive narrative of the relationship between the policy process and decades of institutionalized racism in the food system. At the January 2020 Colorado Food Summit, I observed panelists discuss the most significant issues facing the state's food system, which influenced my selection of cases. Speakers at the conference included a variety of stakeholders from academics to grocery store owners and family farmers. They all agreed that government policy is at the crux of health disparities stemming from food deserts and labor shortages being filled by immigrants and refugees. By March, their concerns were validated by deadly Covid-19 outbreaks in food processing facilities nationwide. The immigrants and refugees filling labor shortages in the food system also bore the brunt of the pandemic and showed that although the Chicano Movement dissipated in the 1980s, the political inequities that they fought persist. Since policy adoptions by one unit of government are influenced by that of another in most instances, the policy diffusion framework proved to be a robust method for analyzing the origins of policies that either mitigate or sustain these problems. But history cannot be overlooked as the most powerful force driving such systemic inequality. Therefore, the study borrows the process tracing method from historic institutionalism to establish awareness of critical junctures from the 20th century that are especially responsible for modern inequality like food deserts, and discriminatory immigration enforcement such as Secure Communities. Though recent scholarship has been preoccupied with the globalization of American agriculture during the era of liberal economic reform (e.g., NAFTA 1994) to explain inequality in the food system, we find that the roots of inequality can be traced back much

further to moments of upheaval in early 20th century Mexico, and US labor recruitment policies such as the Bracero Program.

It's also discovered that collaborative approaches to the policy process seeking a diversity of stakeholders and information are associated with the learning mechanism. Demonstrated clearly in the third case about the USDA grant, they had the most positive outcomes for equality in agricultural labor by eroding the institutionalized racism stemming from de jure segregation. But in the first two cases, there is as much evidence of policy entrepreneurs achieving policy adoptions by shrinking the circle of influence and by mandating, or coercing, policy onto lower levels, which had deleterious effects on equal rights and opportunity. Table 1 (next page) uses arrows to display the direction of policy transfers from one agency to another. For example, in Case 3, the USDA adopted its Farm to School Grant by learning from the DoD, and Greeley Evans School District 6 adopted it by learning from the USDA. In the second case, competition between the state/local health departments and the federal government gave way to coercion. The first case shows that coercive top-down diffusion was met with competition from state and local levels which forced the DHS to reform its enforcement policy.

Learning and coercion mechanisms were demonstrated repeatedly, and imitation occurred once in the first and third cases. Competition was also present but not in a way traditionally considered by policy diffusion literature. Problem severity and financial resources were the primary motivations (or obstacles) for policy adoption. This study suggests once more that the unified model is the most comprehensive model in diffusion framework to-date. While other models, like the national interaction model, would prove applicable, none would be flexible enough to recognize as many variables as the unified model.

Table 1 – Policy Diffusion Matrix

	Case 1: Secure Communities	Case 2: Covid-19 in Meatpacking	Case 3: USDA Farm to School Grant
Learning	DHS --> State/Local Secure Comm. Suspended (2014) after DHS task force consults with stakeholders, finds significant civil rights violations.	WCDPHE-->CDPHE CDPHE mandates JBS to close (4/10/20) after adopting WCDPHE mandates (4/4/20).	USDA --> DoD; GESD6 --> USDA School districts adopt lunch program from USDA after consultations with DoD about food procurement.
Coercion	DHS/ICE --> State/Local DHS/ICE use 9/11 to enlist support of other agencies to enforce Secure Comm. (2006).	CDC/White House-> WCDPHE/CDPHE CDC forces CDPHE to relax 4/10/20 mandates or lose federal Covid-19 assistance, & POTUS nationalizes meatpackers.	White House --> USDA POTUS requests USDA to devise solutions to low-quality school lunch and rising rates of child obesity.
Imitation	Weld County DA/Sheriff --> ICE/DHS Operation Numbers Game (2008) replicates Operation Wagon Train (2006).	N/A	USDA --> DoD USDA deliberately replicates DoD food procurement via Farm to School grant.
Competition	DHS/ICE <--> State/Local Coalitions of officials and activists withdraw support of Secure Comm. & turn to court system.	WCDPHE/CDPHE <--> CDC/White House CDC/POTUS compete with state/local health officials over appropriate safety measures.	N/A

Covid-19 outbreaks among workers at processing facilities left grocery shelves unstocked, illustrating how civil rights and public health disparities threaten the stability of the entire food system. Each of the cases describe policies that put equality at risk. But the last one in particular, about the USDA grant, highlights how the policy process can potentially improve the trajectory set in motion by history's critical junctures. The coercive tactics that the federal government used to facilitate the replication of Secure Communities at state and local levels, such as Operation Wagon Train and Operation Numbers Game in Greeley, were bound by their nature to cause the negative outcomes that they did. By contrast, when the Department of Homeland Security chose to learn from the experiences of state and local law enforcement, they sought to adopt a more realistic enforcement strategy. And, USDA's Farm to School Grant Program is an example of how productive the policy process can be when agencies and levels of government take a cooperative approach by learning from one another. Unfortunately, a lack of awareness and funding stand as obstacles to further diffusion of the grant program nationwide despite its potential to promote equal access to nutrition.

Food deserts and other health disparities in surrounding neighborhoods are reminiscent of problems that Cesar Chavez, Dolores Huerta, and the UFW organized against. Also familiar to the 20th century is the political contest over the policy process, between those who wish to increase political participation, and those who stand to lose in more active and well-informed polity. Such icons of the Civil Rights movement knew that the levers of change were in the policy process and that they had to get people engaged at the grassroots. Organized resistance to inequality has also been carried from 20th century into the 21st century. Creating outlets in the policy process for such movements is essential to improving the entire food system, for everyone's sake. Without the generations of migrant, immigrant, and refugee workers as well as

political activists, who else could feed the growth of the United States, and the world, into this century?

The Trump administration took for granted these contributions and ignored the civil rights leaders of past and present by neglecting to facilitate a legitimate, public forum for deciding policy. Not only was it undemocratic, but led to grave tragedies for essential workers in the American food system and left life hanging in the balance for many more. Employing the policy diffusion framework with approaches from historical institutionalism tells us that despite measurable progress in food system equality since the 20th century, immigrant workers and communities are still marginalized by the policy process. Though, important not to overlook is the power that such communities are able to leverage in politics. Progressive policy victories won by the Chicano Movement are the bedrock of a continued resistance against systemic racism in the food system.

Future applications of the policy diffusion framework could be made more intriguing by further debating the competitive nature of the policy process beyond the general economic assumptions about, and the geographical applications of, the competition mechanism. My cases show that competition can be quite subtle and difficult to tease out. Cities and states don't just adopt policies to get an economic edge over their neighbor, agencies also make alliances and rivalries with one another over certain policy problems, and they compete by transferring their preferred policies amongst themselves. For example, until Dr. Mark Wallace retired from the WCDPHE as its director, he and the state of Colorado competed with the White House and the CDC (Fendt, 2020). And, states like Colorado, California, and Pennsylvania took the lead in a competition with the DHS and ICE to reform immigration policy (AP Wire, 2014). Under what conditions do agencies take a collaborative approach versus a combative approach to the policy

process? Does a competitive policy process always guarantee a suboptimal outcome? Or, can competition be leveraged to break away from problematic policies?

Another fascinating route for policy diffusion studies could follow an investigation of how to encourage activation of the learning mechanism in the policy process by increasing political participation, communication and information transfer between agencies and jurisdictions, and at the grassroots level with their constituents. What incentivizes agencies and jurisdictions to share their experiences and policies, or not? The most fearsome challenges facing the food system can't be resolved without a more democratic approach.

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