

Supporting Statement

CHILDHOOD INJURY AND ADULT OCCUPATIONAL INJURY SURVEYS OMB No. 0535-0235

A. JUSTIFICATION

This submission is a request for the renewal of a currently approved information collection. The previous collection was a survey of childhood injuries conducted by National Agricultural Statistics Service (NASS) for the National Institute for Occupational Safety and Health (NIOSH) in 2007. It focused strictly on childhood injuries to the general farm population. This new submission is for a national childhood agricultural injury and adult occupational farm injury survey of the minority farm population. The last national-level survey of childhood injuries and adult occupational injuries to the minority farm population was conducted by NASS and NIOSH in 2004. The last childhood injury and adult occupational farm injury survey was conducted by NASS and NIOSH in 2005.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The primary function of the National Agricultural Statistics Service is to prepare and issue State and National estimates of crop and livestock production under the authority of U.S. Code Title 7 Section 2204. NASS has been asked by the National Institute for Occupational Safety and Health to conduct a national childhood agricultural injury survey and an adult occupational farm injury survey. Together they are designed to 1) provide estimates of annual childhood nonfatal injury incidence rates, annual injury frequencies, and descriptive injury information for children under the age of 20 living on, working on, or visiting on farming operations in the United States and 2) provide estimates of the annual occupational adult nonfatal injury incidence rates, annual occupational injury frequencies and descriptive injury information for farm operators and their employees 20 years of age or older. The information collection combines the youth and occupational injury surveys to reduce the number of contacts on the targeted farm population.

NIOSH is mandated to conduct research and make recommendations for the prevention of work-related disease and injury under Section 20 of the Occupational Safety and Health Act, 29 U.S.C. 669 and Section 501 of the

Federal Mine Safety and Health Act, 30 U.S.C. 951. A major problem in planning injury prevention programs for farm children is the lack of surveillance data, especially for those injuries that are nonfatal. Injuries to children living on, working on, or visiting farms were the focus of a special NIOSH initiative directed by Congress in FY 1997. Information on occupational related injuries was the focus of a NIOSH initiative directed by Congress in 1990. Obtaining injury information on farm operators and their adult employees is important to the design and implementation of occupational injury prevention programs on farms.

For this survey, an injury is defined as any condition that results in one-half day or more of restricted activity (youth missed school, youth or adult could not perform normal activities, youth or adult missed work). An agricultural injury is defined as any injury meeting this definition that occurred to a youth less than 20 years of age on the farm property (including the homestead) or occurred to an adult while performing work for the farming operation, either on or off the farm. This definition excludes injuries that occur to youth off the farm site (e.g., injury at school or athletic events), unless that injury is associated with farm work. An adult occupational injury is defined as any injury meeting the definition of an injury involving a farm operator or employee 20 years of age and older that occurred as a result of performing work for the farming operation, either on or off the farm.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The objective of this project is to develop a uniform inquiry for determining the frequency, incidence rate, and characteristics of childhood agricultural injuries occurring in the United States and to obtain similar information on occupational farm injuries of adults. This will provide estimates at the regional and national level for youth injuries, adult occupational injuries, and tractor demographics.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Web-based or electronic data reporting is currently being studied for all NASS information collections and many conversions have already been done. However, due to the nature of this reimbursable program, NASS

feels that the development of a web-based instrument would not be practical at this time.

4. Describe efforts to identify duplication.

NASS cooperates with State Departments of Agriculture and Land Grant Universities to conduct agricultural surveys. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. There is no duplication of questions asked of producers in this docket. NASS samples are coordinated to ensure that respondent burden is minimized. Information derived from these surveys is not available from any other sources.

NIOSH has contacted and assessed data collected by the Department of Labor, Consumer Products Safety Commission, National Center for Health Statistics, and the National Safety Council to determine if more current information was already available on occupational farm injury data that was nationally representative of all farming operations. Such information was not available from these sources, nor were they aware of any such data being collected by any other agencies. Current information on childhood agricultural injury data at the national level is not available from these sources either, nor was there any knowledge of any other sources of these data.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.

There is no additional impact or burden placed upon small farming operators. Through sampling we try to limit the number of small operators selected for this survey. Information requested on the childhood injury and adult occupational injury questionnaires can be provided with a minimum of difficulty by the respondents, generally with little or no reference to their record books. A brief series of screening questions allows the large number of respondents who do not qualify for the childhood injury survey to screen out quickly. The childhood injury survey and the adult occupational farm injury survey have been combined in one questionnaire to reduce the number of contacts on the population.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the data collection is not conducted, it will prevent NIOSH from establishing an ongoing surveillance system to track farm injuries occurring in the U.S. This will decrease NIOSH's ability to direct both the childhood

and adult farm injury prevention programs requested by Congress. Not having this data collection will also decrease NIOSH's ability to track changes in farm-related injuries over time, and decrease the ability to evaluate the impact of its injury prevention efforts.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to report information to the agency more often than quarterly;...

There are no special circumstances associated with this information collection.

8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

The Notice soliciting comments was published in the Federal Register on February 14, 2008 on pages 8646-8647. One comment was received, similar to others regularly received from this correspondent.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

As with the first meeting held back in 1997 NIOSH will ask interested parties for input on all aspects of the NIOSH initiative as part of their specifications process. The meeting will be held July 28, 2008 in Denver, Colorado.

In addition to academic experts, NIOSH has contacted the U.S. Department of Agriculture, the U.S. Department of Labor, the U.S. Consumer Products Safety Commission, the National Center for Health Statistics, the University of Minnesota, and the National Safety Council on whether they were collecting youth farm injury data that would meet the needs of NIOSH. They were also contacted to determine if information was already available on occupational farm injury or tractor demographics that were nationally representative of all farming operations. None of this information was available.

9. Explain any decision to provide any payment or gift to respondents.

There are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

All questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance.

11. Provide additional justification for any questions of a sensitive nature.

If the respondent is married or single, living with a partner, the sex of the respondent's spouse or partner is asked. This question is necessary to get a complete picture of the demographic makeup of the household and will have an impact in assessing household adults who may be at risk for work-related injuries on the farm.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

50,500 farm operations will be selected from the NASS list frame. Fifty thousand will be contacted by telephone for a CATI interview—half for the childhood injury survey alone and half for the childhood injury plus adult injury survey. The projected sample size is the same as last time, even though last time we collected farm injury data for all farms and this time we are concentrating on the minority farm population. In order to receive enough data to be able to publish detailed results by racial minority groups and Hispanics, it was determined that the sample size needed to remain the same. The pilot survey will consist of 500 of the farm operations who will be from the childhood injury plus adult injury survey. Test interviews indicate that respondents need about 5 minutes to complete the childhood injury interview and less than 10 minutes to complete the adult occupational injury interview. Respondents with no children or no childhood injuries will screen out early in the childhood injury interview. Also, farms with no occupational injuries will screen out early in the adult occupational injury interview.

Projected Childhood Injury and Adult Occupational Injury Survey (NIOSH) Annual Burden Hours for 2009												
Survey	QID	Sample Size	Freq	Responses				Non-response				Total Burden Hours
				Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr	Burden Hours	
Pilot Survey:												
Both Child and Adult Injury Questions		500	1	400	400	10	67	100	100	2	3	70
Actual Survey:												
Brochures		50,000	1	40,000	40,000	5	3,333	10,000	10,000	1	167	3,500
Advance Letter		50,000	1	40,000	40,000	5	3,333	10,000	10,000	1	167	3,500
Questionnaires:												
Child Injury Survey	110916	25,000	1	20,000	20,000	5	1,667	5,000	5,000	2	167	1,834
Adult Injury Survey	110916	25,000	1	20,000	20,000	10	3,333	5,000	5,000	2	167	3,500
Totals		150,500		120,400	120,400	5.8	11,733	30,100	30,100	1.3	671	12,404

Reporting time of 12,404 hours are multiplied by \$24 per hour for a total cost to the public of \$297,696.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There are no capital/startup or ongoing operation/maintenance costs associated with this information collection period.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

NIOSH has contracted with NASS to collect the data. The cost of data collection is estimated to be \$283,500 based on an estimated 22,500 hours worked by 240 enumerators at an average pay of \$12.60 per hour. NIOSH will provide NASS with an additional \$466,500 for staff labor, fringe benefits, materials and supplies, use of equipment and facilities, field tests, telephone, and general administrative overhead costs. These are one-time, nonrecurring costs.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

Burden will rise from 12,111 to 12,404 hours, an increase of 293 hours.

- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

All editing of the data will be conducted by NASS, beginning when the first data is received in late April 2009 until mid-May, 2009. The edited data file will be provided to NIOSH, who will conduct the data analysis and summarization. Frequency tables using various categorical groups will be developed at both the regional and national level. A joint NASS/NIOSH release of the major results of the data analysis will be issued in the winter of 2009. NIOSH products include; technical reports to be published by NIOSH at a major agricultural safety and health conference in June of 2010; informational pamphlets targeting farm operators and farm families in the summer of 2010; and a NIOSH release of detailed results in December 2010. Peer reviewed journal articles based on results of this survey are expected to be published during 2011.

The complete results of 2005 data are not yet published but the information from the 2005 and other past surveys have been presented in several forums. See the attached file "NIOSH-USDA Publications.doc" for a more complete list of different products from the past surveys.

In addition to these publications, NIOSH will be presenting technical papers at the upcoming National Institute for Farm Safety national conference in June of this year. The papers include: a paper on the 2006 Childhood Agricultural Injury Survey; a paper for ATV use by farm youth from the 2006 Childhood Agricultural Injury Survey; a paper on the use of Roll-Over Protective Structures (ROPS) on farm tractors used on minority farm operations from the 2003 Minority Adult Injury Survey; and results from the Farm Safety Survey collected in 2006.

The development, data collection, and publication dates are shown below.

Questionnaire design	August 2008 - December 2008
Systems development	November 2008 - December 2008
Sample selection	January - February 2009
Pilot survey	February 2009
Advance letter	February 2009
Telephone interviews	March - April 2009
Process and edit data	March - May 2009
Data file to NIOSH	June 2009
Tabulate and analyze data	June - November 2009
Press Release (preliminary)	Winter 2009
Publication of full report	August 2010

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

There is no request for approval of non-display of the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

There are no exceptions to the certification statement.