Note to Reviewer

Subject : Terms of Clearance for 1205-0453:

The National Agricultural Workers Survey (NAWS)

## **Background**

This information clearance request (ICR) was approved with change on October 24, 2008. The collection was approved, however, only until January 31, 2009 with the understanding that authorization would be extended for an additional period upon complying with the clearance terms. Among the terms, the Employment and Training Administration (ETA) was required to further develop the survey's statistical methods, submit the revised ICR to the Office of Management and Budget (OMB) by December 15, 2008, and place a notice in the Federal Register allowing 30 days for public comment.

### **Bureau of Labor Statistics Review**

While ETA was able to satisfy all concerns regarding how respondents are sampled in this survey before the December 15 deadline, additional time was needed for ETA's contractor to develop the mathematical formulas and algorithms for the survey's variance estimators and weighting procedures. These final concerns, however, have been addressed.

On January 16, 2009, the Bureau of Labor Statistics (BLS) completed its review of the survey's methods and expressed that it "believe(s) that the mathematical material in the current package is consistent with OMB standards." BLS, however, also noted on the January 28, 2009 concurrence form that additional technical work may be required. The ETA will welcome any further input the OMB or the BLS may have in this regard.

#### **Minor Questionnaire Accommodations**

Between October 24, 2008 and the current date, two Federal agencies that have currently approved questions in the NAWS requested minor changes to the questionnaire.

### 1. Health and Human Services

The Department of Health and Human Services, Administration for Children and Families, which is mandated by the Improving Head Start for School Readiness Act of 2007 to estimate the population that is eligible for the Migrant and Seasonal Head Start (MSHS) program, requested that: 1) respondents who are separated from their family at the time of the interview be asked why family members didn't migrate with the respondent, 2) the look-back period on migration be expanded from 12 to 24 months, and 3) the income ranges in the response categories for the income questions be narrowed from \$4,499 to \$2,499 for all incomes above \$20,000. These changes are reflected on pages 2 (questions A31 and A32), and 17 (questions G1, G2, and G3), respectively, in the proposed primary questionnaire (Appendix B). These minor modifications are needed to more accurately estimate the population that is eligible for MSHS.

# 2. <u>National Institute for Occupational Safety and Health</u>

The National Institute for Occupational Safety and Health (NIOSH), which uses the NAWS to comply with its mandate to collect agricultural occupational injury data, asked that the interviewer dialogue preceding the injury screening questions be modified for the purposes of: 1) putting the respondent more at ease about answering the ensuing injury screening questions, and 2) better informing the respondent about the types of incidents that qualify as injuries in this surveillance. In addition, NIOSH asked that the order of the injury screening questions be changed to correspond with the severity of injury type, from lowest to highest. These changes are reflected on page 18 of the proposed primary questionnaire (Appendix B). The actual injury questions (Appendix D), however, will not be changed.

#### **Next Steps**

As discussed with OMB during the initial review of this collection, it is imperative that the second of this year's third interview cycle begin by the beginning of March 2009. NAWS is designed to be nationally representative of hired crop farm workers and interviews are scheduled over three annual interview cycles to correspond with peak agricultural activity across the nation. Delaying the second cycle of interviews would introduce bias in the sample and would weaken the quality of the 2009 data.