SUPPORTING STATEMENT FOR EXTENSION OF OMB APPROVAL OF THE FOOD SECURITY SUPPLEMENT TO THE CURRENT POPULATION SURVEY

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Submitted by:

U.S. Department of Agriculture Economic Research Service 1800 M Street, NW Washington, DC 20036

Introduction

The Economic Research Service (ERS) of the U.S. Department of Agriculture (USDA) is requesting OMB clearance for ongoing fielding of the USDA Food Security Supplement to the Current Population Survey (CPS), which has been fielded annually since 1995. The supplement was successfully fielded by the Census Bureau under the sponsorship of ERS from 1998-2005, and previously, under the sponsorship of the Food and Nutrition Service (FNS) from 1995-1997. The survey instrument is included as Attachment A. The content of the questionnaire is unchanged from the December 2008 collection

An ongoing food security research and monitoring project conducted by ERS and FNS has developed multiple-item measures of food insecurity at various levels of severity and used these measures to monitor and report on food security in the Nation's households annually since 1995. The most recent report, based on the December 2007 survey, indicated that 88.9 percent of U.S. households were food secure throughout the entire year prior to the survey, while 11.1 percent were insecure at least some time during the year, including 4.1 percent with very low food security. Food security statistics derived from the CPS Food Security Supplements are also reported in several health and nutrition monitoring projects including *Healthy People 2010* (Department of Health and Human Services), *America's Children: Key National Indicators of Well-Being* (Interagency Forum on Child and Family Statistics), and the *Statistical Abstract of the United States* (U.S. Census Bureau).

ERS conducts and funds research on the measurement, causes, and consequences of food insecurity, some of which requires CPS Food Security Supplement data. Ongoing research aims to improve the measurement and representation of the frequency and duration of food insecurity, improve understanding of the causes of food insecurity, and improve indicators based on Food Security Supplement data. Such indicators provide information on the need for Federal food assistance programs and on how well those programs are functioning.

In the clearance of the Supplement for the December 2006 collection, OMB specified the following terms:

By September 30, 2007, ERS should provide to OMB via email or during an oral briefing a detailed description of the specific characteristics of food security and its measurement that make item response theory the preferred methodological and statistical basis for analyzing the data. ERS should describe both the long and short range plans for further modifications to the food security battery and development of a hunger measure. Also, ERS should provide a status report regarding whether alcoholic beverages have been excluded from questions that ask abou food expenditures.

ERS provided the requested information on September 18, 2007, by email to OMB staff: Richard Bavier, Margaret Malanowski, and Brian A. Harris-Kojetin. A copy of the communication is provided as Attachment G. Subsequently, changes to the questionnaire proposed in that memo for the December 2007 survey were implemented. Analysis of the split ballot test of alternatives to the "balanced meals" question found that none of the alternative wordings performed better than the original wording. The December 2008 questionnaire initiated the proposed exploration of splitting question SH2 (about adults cutting the size of meals or skipping meals) into two questions.

In 2007, ERS entered into a cooperative agreement with Iowa State University to study several technical food security measurement issues as recommended by the Committee on National Statistics (CNSTAT). At USDA's request, CNSTAT convened an expert panel in 2003-06 to conduct a thorough review of the food security measurement methods. The CNSTAT panel recommended that USDA continue to measure and monitor food insecurity regularly in a household survey, affirmed the appropriateness of the general methodology currently used by USDA, and suggested several ways in which the methodology might be refined, contingent on confirmatory research. The panel recommended that USDA consider several "more flexible alternatives to the dichotomous Rasch Model that underlies the current food insecurity classification scheme" The ERS-Iowa State University research project will explore five of those alternatives that were specifically identified by the CNSTAT panel. As of April 2009, four working papers have been drafted, and research is under way on the fifth. Further refinement of the papers, including review by a national expert on item response theory methods will be undertaken prior to finalizing the papers.

A. JUSTIFICATION

1. Circumstances that Make the Collection Necessary

The Supplement is sponsored by USDA as research and evaluation activity authorized under Section 17 of the Food Stamp Act of 1977 as amended. The data to be collected will be used to address multiple programmatic and policy development needs of FNS and other Federal agencies.

One of USDA's strategic planning objectives is to improve the nation's nutrition and health by improving access to nutritious food. It accomplishes this goal, in part, by providing children and needy families access to a more healthful diet through its food assistance programs and comprehensive nutrition education efforts. USDA's 15 food assistance programs, administered by the Food and Nutrition Service (FNS), account for about 60 percent of the Department's budget. The largest program, the Supplemental Nutrition Assistance Program, is the primary source of nutrition assistance for low-income Americans enabling eligible households to improve their diet by increasing their food purchasing power. As the Nation's primary public program for promoting food security and alleviating hunger, the Supplemental Nutrition Assistance Program needs to regularly monitor food security conditions among its target population.

This monitoring need requires that USDA continue basic data collection, analysis, and evaluation. These data provides the basis for regular monitoring as well as ongoing development of scientifically-grounded methods for the consistent national measurement of food insecurity. These are essential elements of the explicit USDA responsibility under the Food Stamp Act of 1977, as amended. Periodic collections of the CPS Food Security Supplement are fundamental in this monitoring and research effort.

ERS sponsors this data collection and conducts the monitoring and research work in partial fulfillment of its strategic plan mission to "inform and enhance public and private decision making on economic and policy issues related to agriculture, food, the environment, and rural development." More specifically, these activities contribute to ERS fulfilling its strategic plan goal 5 (in part): "Enhanced understanding by policymakers, regulators, program managers, and organizations shaping public debate of economic issues relating to the nutrition and health of the U.S. population, including factors related to food choices, consumption patterns at and away from home, food prices, nutrition assistance programs, nutrition education and food industry structure."

2. Purpose of Information

The purpose of the CPS Food Security Supplement is to periodically obtain reliable data from a large, representative national sample as a basis for monitoring the prevalence of food security, food insecurity, and very low food security within the U.S. population as a whole and in selected population subgroups, and continuing development and improvement of methods for measuring these conditions.

The data collection will contribute to objectives originally identified in Task V-C-2.4 of the Congressionally mandated 10-Year Plan for the National Nutrition Monitoring and Related Research Program (NNMRRP) to:

> "Recommend a standardized mechanism and instrument(s) for defining and obtaining data on the prevalence of "food insecurity" or "food insufficiency" in the U.S. and methodologies that can be used across the NNMRRP and at state and local levels." (See Attachment B.)

Other measures of food program impacts are important in the Nation's nutrition monitoring system, such as measures of dietary intakes and estimates of nutritional adequacy. These measures, while essential, are inadequate for monitoring the effects of rapid economic and program changes upon the food needs of the low-income population. The CPS-based measures of food insecurity are more parsimonious in the amount of data they require and are easier to administer than dietary surveys. Consequently, the CPS-based measures lend themselves to use as national monitoring of households' economic access to adequate food. In addition, they are easily adapted to various special purpose and geographically localized surveys for comparison and benchmarking to the national baseline measures.

The proposed data collection also addresses provisions of the 1993 Government Performance Review Act (GPRA) which require responsible Federal agencies to develop and apply new means of quantifying the effects of the major programs within their jurisdiction and tracking changes in those effects over time. Ongoing collection of nationally representative food security data represents an important step in quantifying the overall, bottom-line impacts, for the U.S. population and population subgroups, of the network of food assistance programs in general and of the Supplemental Nutrition Assistance in particular. In response to conclusions drawn by the Committee on National Statistics, food security statistics will be interpreted in the context of information about changes in need and other social, economic and programmatic factors that could program participants.

Food Security Supplement data collected in earlier years have been used by USDA as the basis of its annual series of statistical reports on food security in the United States, the most recent of which is *Household Food Security in the United States, 2007.* The reports provide food security statistics at the national level, for critical subpopulations, and for geographical regions and States as well as statistics on food spending and use of Federal and community food assistance programs by food-insecure households. The data have also been used to study factors affecting households' food security and the relationships of food security with food programs and food spending.

Other Federal health and nutrition monitoring projects also use food security statistics derived from the CPS Food Security Supplements to assess National progress in food security. These include: *Healthy People 2010* (Department of Health and Human Services), and *America's Children: Key National Indicators of Well-Being* (Interagency Forum on Child and Family Statistics).

Monitoring food security is also important for enhancing understanding of the general well-being of the American population. Food security, or assured access to enough food for an active, healthy life, is an important specific aspect of well-being. Food insecurity is undesirable in its own right, but also is a risk factor for more serious conditions of hunger, nutritional inadequacy, and associated health and developmental problems. As with other areas of specific need, such as inadequate access to health care or housing, food insecurity is symptomatic of compromised well-being in general. With increasing State responsibility for welfare programs, monitoring food security at the State level may be especially important for evaluating the consequences of different approaches to provision of safety net programs.

The content of the questionnaire proposed for December 2009 is the same as that used in December 2008. The 2009 instrument continues collection of household food expenditures and program participation information, as in 2008, since these factors are major correlates of food insecurity.

3. Improved Information Technology

This entire set of questions, as a supplement to the CPS, is designed to obtain the required information while keeping respondent burden to a minimum. The proposed items and interviewer procedures have been developed through consultation among the Census Bureau, FNS, NCHS, other Government Agencies, and several academic and research institutions. The use of Computer Assisted Personal Interviewing (CAPI) and Computer Assisted Telephone Interviewing (CATI) is deemed the most appropriate collection method, given existing available information technology. The CAPI/CATI technology makes feasible the use of a multi-level screening pattern to reduce burden by skipping questions indicating more severe food insecurity if a household shows no indications of food insecurity on several less severe questions.

4. Efforts to Identify Duplication

Several items collected in this Supplement are collected on other nationally representative surveys. For example, among existing Federal surveys, the National Health and Nutrition Examination Survey (NHANES) conducted by the National Center for Health Statistics includes the core food security items. The Census Bureau's Survey of Income and Program Participation (SIPP) has included the single USDA food sufficiency question and selected items from the core module in its occasional Topical Module on Well-Being. The National Center for Educational Statistics has included the core food security questions in several administrations of its National Longitudinal Study of Youth— Kindergarten and Birth cohorts. However, these Federal surveys are designed for specific research purposes and do not provide suitable data for timely and reliable monitoring of the prevalence and severity of food insecurity in the Nation's households and in critical subpopulations.

5. Efforts to Minimize Burden on Small Business

The collection of food security information does not involve small businesses or other small entities.

6. Consequences of Less Frequent Collection

USDA plans to collect this information annually as a supplement to the December CPS. Annual tracking of these conditions will ensure that policy officials are aware of changes in a timely manner and will help increase understanding and awareness of the effects of economic, programmatic, and other factors on the ability of households to meet their basic food needs.

7. Consistency with 5 CFR 1320.6

These data will be collected in a manner consistent with guidelines expressed in 5 CFR 1320.6.

8. Federal Register Notice and Consultation Outside the Agency

Notice of Intent to Request Revision and Extension of a Currently Approved Information Collection was published in the Federal Register on April 7, 2009 (Volume 74, Number 65, Pages 15689-15690). No comments were received by USDA in response to the notice.

In 2007, ERS entered into a cooperative agreement with Iowa State University to study several technical food security measurement issues as recommended by the Committee on National Statistics (CNSTAT) in its review of the food security measurement methods conducted in 2003-06. The consultation is ongoing.

ERS has consulted with a number of people outside the agency in developing plans for this data collection. Many experts from a broad range of disciplines and institutions were consulted during the development and refinement of the instrument that has been used in previous years. The 2005 questionnaire, which is essentially unchanged through 2009, was reviewed by:

> Steven Carlson, Family Program Staff Director Office of Analysis, Nutrition and Evaluation Food and Nutrition Service 703-305-2154

Kathy Radimer Division of Health Examination Statistics /NHANES National Center for Health Statistics Centers for Disease Control and Prevention Department of Health and Human Services 301-458-4684

David Holben Department of Human and Consumer Sciences Ohio University 740-593-2875

Judi Bartfeld Department of Consumer Science (and) Institute for Research on Poverty University of Wisconsin-Madison 608-262-4765

David Hancock Survey Administration Branch National Agricultural Statistics Service United States Department of Agriculture 202-690-2388

9. Paying Respondents

Neither the USDA nor the Bureau of the Census make any payments or provide any gifts to individuals participating in the CPS.

10. Assurance of Confidentiality

The Census Bureau will collect the Supplement data in compliance with the Privacy Act of 1974 and OMB Circular A-130. Each sample household receives an advance letter approximately 1 week before the start of the initial CPS interview. (See Attachment C.) This letter includes the information required by the Privacy Act of 1974, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Field representatives must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, field representatives provide households with the pamphlet "The U.S. Census Bureau Respects Your Privacy and Keeps Your Personal Information Confidential." (See Attachment D.) All information given by respondents to Census Bureau employees is held in strict confidence under Title 13, United States Code, Section 9. (See Attachment E.) Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

11. Justification for Sensitive Questions

The Food Security Supplement does not contain any questions of a sensitive nature.

12. Respondent Burden

The estimated respondent burden is 6,915 hours for fiscal year 2010. This translates into an average respondent burden of 7.6 minutes for each of the 54,400 households expected to be in the Supplement universe. The estimate is based on response patterns from the December 2003 and 2004 Supplements. The table below provides a breakdown of the number of households expected to complete different parts of the Food Security Supplement questionnaire and average and total response time for households within each category.

With Screeners, Total Supplement Questions Asked	Number of respondents	Average response time (hours)	Total hours
1. Supplement Non-Respondents	7,676	0.02	154
2. S1-9, SS1	25,911	.13	3368
3. S1-SP9, SS1-SSM4, SC1-SCM4	7,627	.15	1144
4. S1-SP9, SS1-SHM5, SC1-SCM4	2,475	.17	421
5. S1-SP9, SS1-SSHMF1, SC1-SCM4	2,084	.18	375
6. S1-SP9, SS1-SSM4, SS5-SHM1, SC1-SCM4	4,716	.15	707
7. S1-SP9, SS1-SHM5, SS5-SHM1, SC1-SCM4	1,197	.18	215
8. S1-SP9, SS1-SSM4, SS5-SSHM5, SC1-SCM4	1,180	.19	224
9. All Questions	1,534	.20	307
Total Households	54,400	.127	6915

About 62 percent of the sample is expected to fall in the first two groups. These will include non-respondents and households with incomes above 185% of the poverty line who indicate no food security problem on questions S9 and SS1 and therefore answer only the food expenditure and food sufficiency questions. Another 23 percent of households (groups 3 and 6) are expected to receive these as well as the least severe food security questions and a set of food assistance questions and coping questions screened by household composition. The remaining 15 percent of the sample will receive some or all of the additional questions about reduced food intake and conditions associated with it. These estimates were based on the numbers of households in each category in the 2006 and 2007 surveys.

Average times assume that non-respondents will require about one minute; those respondents falling in group 2 in the above table would require nearly eight minutes; those in groups 3 and 6, nine minutes; those in group 4, ten minutes; those in groups 5 and 7, eleven minutes; those in group 8 11 and a half minutes; and those in group 9 12 minutes, for an average of 0.127 hours, or 7.6 minutes.

In this Supplement, one respondent will answer for the entire household. No cost other than the respondents' time is incurred. The annualized cost of the respondents' time spent in answering the Supplement questions is estimated to be \$127,928. Cost of respondents' time is estimated based on the average hourly wage for production and non-supervisory private-sector workers (\$18.50 per hour in March 2009) multiplied by the total response time for all respondents (6,915 hours).

13. Other Costs to Respondents

Other than providing their time to answer the questions, the CPS does not impose any cost burden on respondents. There are no capital or start-up costs.

14. Cost to the Government

The cost to the Government of the Current Population Survey program of data collection, to which this form relates, is borne by the Bureau of the Census, the Bureau of Labor Statistics, and other Government agencies, if involved. The Census Bureau estimates the cost of the Food Security Supplement for December 2009, including related development costs and public-use data provision costs to be about \$600,000 in fiscal year 2010. This cost is borne by ERS and supported through an interagency transfer to the Census Bureau.

15. Reason for Change in Burden

Total estimated burden for the December 2009 supplement is slightly lower (by 124 hours or 1.8 percent) than that estimated in the previous submission for this Supplement (2006). The change is due to the CPS sample size declining somewhat in recent years; the average burden per interviewed household is unchanged from the previous year.

16. Time Schedule, Analysis and Publication Date

The December CPS, of which this Supplement is a part, will be conducted during the second week of December each year. Processing of this Supplement will commence in December. The data will be released to ERS in mid-April. Publication of the annual food security report by ERS is scheduled for mid November. Public-use data files will be released by the Census Bureau about one year after collection of the data.

17. Displaying the OMB Expiration Date

We do not wish to display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date. Instead, we include the OMB control number for the CPS in the survey's advance letter. (See Attachment C.)

18. Conformance to Paperwork Reduction Act Provisions

There are no exceptions to the certification.

19. How is this Information Collection Related to the Customer Service Center?

This information collection is not related to the Customer Service Center.