

**UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)
RISK MANAGEMENT AGENCY (RMA)
OMB NUMBER: 0563-NEW**

Title: FLORIDA AGRICULTURAL WORKERS SURVEY

Purpose:

The purpose of the research is to analyze producer risks associated with the employment of seasonal labor in specialty crops. Specifically, the objective is to clarify labor requirements and assist producers in complying with requirements to better meet the physically intense and time compressed planting, tending and harvesting requirements associated with the production of specialty crops and underserved commodities. The sources of labor related risk are many. Timely labor availability has always been a major concern for producers of labor-intensive specialty crops. Moreover, significant increases in labor cost over the expected labor cost at the beginning of the season are another source of uncertainty for labor-intensive producers. The most likely scenario for a change in traditional patterns of labor availability and cost is a change in the availability of foreign workers, either through legislation or through unexpected regulatory and enforcement changes. Changes in composition of legal status in the existing labor force as well as new entrants from foreign countries could have a significant impact on the cost structure and the availability of labor in specialty crop agriculture.

A. Justification

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.

Collection of information on the labor force in the selected Florida specialty crops is necessary for a research project under a USDA/RMA – University of Florida (UF) partnership agreement. The project establishes labor requirements, assesses labor-related risk, and develops risk management tools to assess risk associated with labor in specialty crop agriculture. No other data source exists with an adequate number of workers and the necessary information to address the research problem from the perspective of farm workers in the three Florida specialty crops: citrus, tomatoes, and strawberries. USDA/RMA - UF will use the information, as Department of Labor (DOL) does, to describe the demographic and employment characteristics of Florida's citrus, tomato, and strawberry workers. Like DOL, USDA/RMA – UF will quantify the labor force participation of these workers, e.g., the number of days per year they are employed in agricultural jobs, how long they typically work for the same employer, how they are hired (directly or via labor contractors), and describe the characteristics of their agricultural jobs, e.g.,

wages and benefits. USDA/RMA – UF will use the collected information to develop a risk management tool for producers of these commodities. The risk management tool will enable producers to determine the costs and benefits of utilizing different mixes of labor and capital, given changes in wages and the supply of workers. The development of this tool is based on authorization under section 522(d) of the Federal Crop Insurance Act. Section 522(d) authorizes USDA/RMA to enter into partnership agreements with public and private organizations for the purpose of increasing the availability of loss mitigation, financial, and other risk management tools for producers of agricultural commodities.

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 information collection will be conducted primarily through in-person surveys using the Florida Agricultural Workers Survey form. The collected data will be used for the research project "Assessing Agricultural Labor Risk for Specialty Crops." The ultimate goal of the project is to analyze producer risks associated with the employment of seasonal labor in specialty crops in Florida, especially risks associated with labor availability. The worker data are one component of the information used to develop risk management tools integrated under the common approach of investment under uncertainty. With the unknown future ease or difficulty of foreign workers entering the country for agricultural work, future labor availability and labor cost are highly uncertain. Tools to evaluate investment in citrus mechanical harvesting are to be developed utilizing investment under uncertainty models. The approach is extended to potential mechanical aids in tomato harvesting and strawberry harvesting and also to evaluate investments in personnel management programs for producers of these same commodities. The worker data to be collected will be used to estimate changes in the composition of the work force and changes in the wage rate resulting, for example, from alternative scenarios about the availability of foreign workers. The point of reference in the following discussion is cycle 55 of the National Agricultural Workers Survey (NAWS) questionnaire.

In order to implement the simulation with investment under uncertainty approach, two preliminary analyses concerning the specialty crop farm worker are necessary. First, we need wage information pertinent to the commodities under consideration. Wage rates are key information in the evaluation of investments involving labor-saving technologies. In addition, wage variation by the worker's legal status is necessary to evaluate the potential for labor-saving technologies in the event of changes in immigration policies and regulations. The relationship between wage and legal status of the worker has been investigated in previous studies (Isé and Perloff 1995, Iwai, et al. 2006, Walters, et al. 2008) using the NAWS data. The proposed survey has an expected sample size of 1,624 Florida farm workers in the three specialty crops of interest and will generate an appropriately sized sample to analyze the specific Florida population of interest.

The second set of analyses is to evaluate how the composition of workers by legal status will change for specialty crops under alternative scenarios for labor availability. Previous research found differences among legal statuses in migration patterns and the likelihood of farm workers staying in U.S. agriculture (Emerson and Napasintuwong 2002, Hashida and Perloff 1996, Iwai, et al. 2005, and Tran and Perloff 2002,). All of these studies used NAWS data, the only existing data source. The limited, one-year work history available in the NAWS data set is likely to result in biased estimates of work duration and mobility. The purpose of the extended work history is to remove this source of potential bias. With the new data set, less restrictive models can be developed to form more reliable predictions of the composition of legal status under alternative labor availability scenarios. Examples of changes in labor availability may arise from more stringent border enforcement, or from legal status change in the existing labor force as was implemented by the Special Agricultural Workers (SAWs) program under The Immigration Reform and Control Act of 1986 (IRCA).

With the predictions on both the wage structure and the composition of legal status of the work force for alternative labor availability scenarios, we can predict how the cost and profit of specialty crop production will change, given the current technology. With this estimate on the uncertain future cost and profit, specialty crop farmers may invest in, and switch to a new technology if the labor availability change results in dramatic increases in labor and total production cost with the current technology. Plausible options may be mechanical harvesting for citrus, and mechanical aids for tomatoes and strawberries. Alternatively, if neither mechanization options nor more costly hand harvesting are economically viable, then a decision to leave the industry may be the best option for the grower. The methodology used in this stage of research is the investment under uncertainty approach as elaborated by Dixit and Pindyck (1994).

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 adapting this means of collection. Also describe any consideration of using information technology to reduce burden.

To reduce burden, a stratified sample is used to represent the population of farm workers in the three selected specialty crops in Florida. To minimize the burden on employers, farm workers are not interviewed during work-time and, whenever possible, the interview is to occur outside the workplace. Interviews will be conducted in the language of the sampled worker, primarily Spanish. It will take approximately 75 minutes to administer the questionnaire. Farm workers are provided an honorarium of \$15.00 to offset the inconvenience and any expense incurred (e.g. childcare, transportation) for their participation. Because of the low literacy rate among farm workers, and because the data are collected by personal interview, the use of information technology to reduce respondent burden is inappropriate.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposed described in Item 2 above.

The NAWS is the only nationwide consistent source of information on the demographic characteristics and employment conditions of hired farm workers. In the previous sections, we have noted the two primary limitations of the NAWS data for the current project:

- The NAWS data does not include an adequate number of Florida farm workers working in citrus, tomatoes and strawberries during the 2009-2010 season, and
- The NAWS work history extends only one year prior to the interview date; an extended work history is necessary to adequately evaluate the effects of wage changes and potential legal status changes on the duration of work in agriculture.

Current Population Survey (CPS) data include selective employment information for farm workers who happen to be included in the CPS sample. However, the CPS data provide very limited work history. The CPS procedure is also not very effective in identifying difficult to survey populations, of which farm workers are on due to their often remote housing locations, unusual living quarters, language other than English, and a reluctance to participate in standard government surveys. Moreover, there would be very few Florida farm workers in the CPS, given the size of the national sample. The USDA's Farm Labor Survey (FLS) collects wage and other employment data for Florida as a part of the national survey. Because it is conducted with personnel managers, however, there is no information on either the demographic characteristics of farm workers or the individual work patterns of farm workers. The data only provide a snapshot of employment from the employer's perspective four times per year.

Administrative data recorded by Social Security numbers in the Unemployment Insurance (ES202) files, as well as files of the Social Security Administration, do not provide the appropriate demographic, employment and health characteristics. Therefore, any of these data sources are likewise inappropriate for use in the current project.

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

As described in Section 12, and in Part B below, employers will be randomly chosen as part of the sampling technique. It is necessary to sample employers first, as there are no universe lists of farm workers. The farm worker sampling frame is constructed with the help of the processors, employers, packinghouse managers, personnel managers, farm labor contractors, or crew leaders, as appropriate. In each case, the 'employer' will serve as a voluntary contact point for the purpose of creating the worker frame.

The burden of this activity on small employers is to be minimized by first determining if the small employer is still in business before contacting that business and by notifying the employer

ahead of time by mail if they have been selected to participate. Farm workers will be interviewed outside of the workplace whenever possible and interviews will not interfere with employers' production activities.

This information collection does not have a significant economic impact on small entities.

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.

The survey for the current project is a one-time survey to be conducted during the winter months when workers are present and actively working in the Florida specialty crops of interest. A representative random sample of employed farm workers can only be obtained by searching for them during the times of the year when they are actively employed. The high mobility of workers and the changing seasonal location of production by commodity require timely sampling in different locations throughout the state as the season progresses.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a) requiring respondents to report information to the agency more often than quarterly;
- b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c) requiring respondents to submit more than an original and two copies of any document;
- d) requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- f) requiring the use of a statistical data classification that has not been reviewed and approved by OBM;
- g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- h) requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

None of the circumstances listed in this section apply to the current project. This information collection is consistent with 5 CFR 1320.5.

8. If applicable, 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. Specifically address comments received on cost and hour burden.

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 record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The 60-day notice for request for comments was published on May 4, 2009, at Vol. 74 No. 84 20450. No comments were received.

The basis for the data to be collected is the NAWS data, the most extensive data available on farm workers. USDA/RMA - UF have discussed the proposed data collection with the Department of Labor, the agency responsible for the NAWS. The Department of Labor in establishing the NAWS conducted a thorough search of available data sources characterizing the demographic, employment, health, and injury data on farm workers. Their finding was that there was no other source for this information, hence the development of the NAWS. Section 1 identified the additional information to be collected that is not currently in the NAWS. This information is of the same type as included in the NAWS, simply extending the work history, and concentrating the sample on Florida citrus, tomato and strawberry workers.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Since farm workers have both time and financial constraints, they will be compensated \$15 for their time responding to the survey. Interviewers are to be trained to provide the incentive just prior to the start of the interview.

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

The survey collects information on wages and working conditions, legal status, occupational health and injury, and recruitment practices. The workers are guaranteed confidentiality to help them overcome any resistance to discussing these issues. The workers are informed of the purposes of the information collection as well as the safeguards to protect its confidentiality.

Interviewers are sworn to protect the confidentiality of interviewees and employers. Workers are

interviewed alone to further protect their privacy. U.S. Code Title 18, Part I, Chapter 93, Section 1905, and U.S. Code Title 7, Chapter 36, Section 1502 and Chapter 55, Section 2276 (appendix III) provide for the confidentiality of reported information. These regulations require that all information collected by surveys can only be used for the purpose in which it is intended and in a way that conceals the respondent's identity. Standard disclaimers that all information will be used for research purposes only and will be presented only in the aggregate will be displayed on all survey forms. Data will be stored on a secure server with access authorized for IT management personnel only.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The questions on legal status and occupational health and injury are likely to be the most sensitive. Based on the quality of responses to these questions in the NAWS survey, however, it is evident that the confidentiality assurances as well as the rapport that develops between the interviewer and respondent makes the questions less intrusive. The legal status questions provide essential information to pursue the objective of the current project. Likewise, health and injury conditions will be useful to predict the employment patterns of the farm workers. On the basis of the NAWS, farm workers respond well to all of the legal status, and the health and injury questions. The former have been asked since the beginning of the NAWS, and the latter have been asked periodically for ten years. The confidentiality of the respondents will be guaranteed.

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

The hour burden for respondents is estimated with reference to the NAWS questionnaire that is the core of the survey instrument for the Florida Agricultural Workers Survey (FAWS). The average interview time for the NAWS questionnaire is 57 minutes per worker based on 20 years of survey administration of the NAWS. The NAWS experience of 57 minutes per questionnaire is consistent with experience in similar surveys of farm workers. One such survey is the 1997 survey of the demographic characteristics and occupational health of migrant Hispanic farm workers in six Northern California Migrant Family Housing Centers. McCurdy, et al. (2003) report that the survey of 1,201 adult farm workers utilized a questionnaire requiring approximately 30 to 40 minutes to complete. Their questionnaire (http://mccurdy.ucdavis.edu/fwis/FW_ADULT_INIT.DOC) was similar to, although shorter than, the NAWS and FAWS questionnaires. Although it included demographic, employment, and health questions, it did **not** include questions on employment benefits, housing, asset

ownership, participation in education and training programs, receipt of needs-and contribution-based social services such as welfare and unemployment insurance, occupational mental health, and child care services. Moreover, the demographic questions were a small subset of the NAWS demographic questions.

Another similar farm worker survey is the California Agricultural Worker Health Survey ([CAWHS](#)). The survey was conducted in 1999 by the California Institute for Rural Studies, Inc. (Villarejo, et al. 2000). The main survey instrument incorporated many of the same questions as the NAWS including the household grid and the work grid, and was administered to 971 California farm workers. The estimated completion time for the interview was 20 to 30 minutes. Unlike the NAWS and FAWS, the CAWHS survey instrument included lengthy sections on access to health care services, self-reported health conditions and doctor-reported health conditions. An additional distinction from the NAWS and FAWS is that the CAWHS also incorporated health-related questions regarding each member of the household. Occupational mental health and child care questions included in the NAWS and FAWS, however, were not included in the CAWHS.

The two significant differences between the NAWS questionnaire and the FAWS questionnaire are the household grid and the work grid.

- Household grid
Considerably less information is collected in the household grid: one question is eliminated for the worker, and six of 15 questions are eliminated for the remaining household members. Since the average number of household members encountered in the NAWS survey is 4.3 (plus the worker), this is judged to reduce the time requirement by 10 minutes.
- Work grid
The NAWS questionnaire asks for the respondent's work information for the past 12 months; we ask the same questions for the past 12 month period. We also ask the respondent for an abbreviated work history from 12 months prior to the interview back to his first job in the U.S. Four questions out of 13 are deleted in this section. The estimated time to obtain work grid data by years of farm work is based on Table 1. The responses to the following question by NAWS workers interviewed in Florida were tabulated for the 2003 and 2004 survey years:
Approximately how many years have you done FARM WORK in the U.S.?
[COUNT ANY YEAR IN WHICH 15 DAYS OR MORE WERE WORKED.]
Based on responses to the above question, the time estimates displayed in Table 1, and an expected 1,624 interviews, the extended work history is estimated to require an additional 678 hours (25 minutes per questionnaire) above and beyond the one-year NAWS work history.

Table 1. Work grid interview time by years of farm work

Years of Farm Work	Minutes required for work grid
1	12
2	20
3-5	30
6-13	45
≥ 14	60

A third more minor difference between the NAWS and the FAWS questionnaires is the inclusion of the NSK (dermatitis problems) segment in the FAWS which is not currently in the NAWS. We add three minutes per questionnaire for the inclusion of this segment.

In summary, the estimated time to administer a questionnaire is 75 minutes on average. This follows from the 57 minute average for the NAWS **plus** an additional 25 minutes for the extended work history **plus** three minutes for the dermatitis segment **minus** ten minutes for the abbreviated household grid.

The estimated total hour burden for the USDA/RMA – UF survey is 2,123 (see Table 2 below). There will be a total of 2,049 respondents contacted, of which an estimate of 241 will be non-respondents. The remaining 1,808 respondents will be divided into two groups and approached for different purposes. The first group consists of the approximately 1,624 randomly selected farm workers who will be administered the questionnaire. This interview will vary in length with an average of 75 minutes. The time varies because factors such as the number of individuals in the respondent's household and the number of jobs he/she had since he/she entered the US labor market. The non-respondents will take approximately 4 minutes for a total of 16 burden hours.

The second group will be 184 employers who will be briefly questioned to construct the worker sampling frame. This conversation will involve confirming the number of workers, selecting a systematic sample of workers, and determining the location of the workers selected for interview. This discussion can last from 5 to 30 minutes, depending on how long the employer chooses to take to explain his/her labor utilization. The average length is approximately 20 minutes.

The only additional cost is that which employers or their representatives incur for helping the interviewer establish the worker frame. The employer is approached strictly as a contact point for the selection of a random group of workers. The employer contacts require an average of 20 minutes per farm. Our estimate of 61 hours is based on 184 employers at 20 minutes per employer. Assuming an employer's time is worth \$45 per hour, the total cost is \$2,745 of

employer time. Since farm workers are compensated for their participation, any potential cost to workers is off-set by the \$15 honorarium.

Table 2. Burden Hour Estimates: Comparison between USDA Florida Study (FAWS) and DOL NAWS

Persons to be interviewed	Survey Instrument	FAWS - USDA Florida Estimates			DOL NAWS Estimates			Combined Total Hours	Combined Total Respondents
		Respondents per Year	Average Time per Respondent (minutes)	Hours	Respondent per Year	Average Time per Respondent (minutes)	Hours		
Hired Crop Workers	FAWS / NAWS Questionnaire	1,624	75 ¹	2,030	3,000	57	2,850	4,880	4,624
Workers with a qualifying injury	Injury Supplement	65 ²	15	16	90 ³	10	15	31	155 ⁴
Agricultural Employers	Point of Contact Only: NA	184	20	61	1,008	20	336	397	1,192
Non-responses	FAWS	241	4	16					
Totals		2,049		2,123	4,008		3,201	5,308	5,816

Notes:

1. Crop workers interviewed in the Florida study will be asked about their entire U.S. farm work history. In the DOL NAWS, one-year of farm work employment is recorded. On average, an additional 25 minutes per Florida subject will be required to capture the extended farm work history.
2. Approximately four percent of the 1,624 interviewed workers (65 persons) will have a qualifying injury to report; they are not included in the total respondents as they are a subset of the hired crop worker respondents.
3. These 90 respondents are not included in the total respondents as they are a subset of the hired crop worker respondents.
4. The 155 respondents who will have a qualifying injury are not included in the total respondents as they are a subset of the hired crop worker respondents

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital, startup, operation, or maintenance costs associated with this program.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The estimated survey cost as set forth in Table 3 is \$497,223. The major component is for data collection: \$367,728. The largest component, \$330,000 is for personal interviews, and includes travel and approximately 5,000 hours of labor (interviews, training, and supervision); this is to be sub-contracted to a firm specializing in surveying populations such as farm workers. The questionnaire differs very little from the NAWS questionnaire, but different statistical methods are employed for the survey design as reflected in the \$97,770 cost for the methods and questionnaire development.

Table 3. Survey Costs

Item	Item Cost	Cost
Methods & Questionnaire Development		\$97,770
Data Collection		
Personal interviews	\$330,000	
University of Florida oversight of survey	5,003	
Worker honoraria	30,525	
Questionnaire printing	2,200	
Subtotal		367,728
Data Entry, Editing & Data Summary		31,725
Total		\$497,223

15. Explain the reasons for any program changes or adjustments reported in Item 13 and 14 of the OMB Form 83-I.

This is a new collection and a one-time survey.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Two types of publications are planned under the project. The first is to be a summary of the

worker data collected. This will be a descriptive report with tabular information summarizing characteristics and attributes that are peculiar to labor risk which is the focus of the project. The second set of publications will summarize analyses conducted with the worker data. Examples of these are analyses of worker transition between agriculture and other employment and non-employment activities, with particular emphasis on legal status of the worker. Other publications will utilize this data, combining it with employer data from other sources to conduct the labor-risk analysis which is the central focus of the project. Worker data must be collected during the winter months when workers are present and actively working. The intent is to conduct the surveys during the October 2009– May 2010 window. Project reports will be completed by the termination date of the UF-USDA/RMA partnership agreement, December 31, 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.

The OMB number and expiration date will be displayed on the survey instrument.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

There are no exceptions to the certification statement.