

**OMB 1205-0453:**

**Non Substantive Change Justification – seven EPA Questions for Pilot Testing and Update on NAWS Action Steps**

The Department of Labor (DOL), Employment and Training Administration (ETA) requests the Office of Management and Budget's (OMB) approval to pilot-test seven new questions in the National Agricultural Workers Survey (NAWS) regarding 1) the amount of time per day farm workers are employed in specific crops and tasks, and 2) farm workers' hygiene- and clothes-laundry practices.

Several Federal agencies utilize the NAWS to meet their information collection needs. The Environmental Protection Agency, Office of Pesticide Programs (EPA/OPP), which has responsibility for assessing exposure to pesticides, is one such agency. The proposed seven questions would be piloted in questionnaires in the last interview cycle of fiscal year 2011, which ends September 30, 2011; and, depending on the quality of the information obtained, they would be administered in all three interview cycles of fiscal years 2012 and 2013. These questions would be administered to no more than thirty farm workers.

The information gathered via the NAWS will assist EPA/OPP with the development of a more robust, data-based response for addressing review panel and stakeholder concerns. Personal hygiene practices such as bathing and laundry patterns can impact the potential magnitude of exposures for individuals over extended periods of time (e.g., if they wear previously contaminated clothing) and also influence the exposures of family members, particularly small children, because of physical contact or residues contaminating residences. An understanding of the distribution of person-specific agricultural tasks and hygiene practices will assist in the development of more rigorous methods for quantifying risks for a population which is potentially more susceptible to increased exposures.

The added time represented by the seven EPA questions to be piloted is estimated at 4 minutes; thus, for the entire questionnaire, the time would increase from 55 minutes to 59 minutes per interview. For the maximum of thirty people selected out of the 1,500 respondents to respond to the questionnaire in which the test pilot questions are included, their burden is estimated at an added 4 minutes per response (x 30 respondents) = 120 minutes or 2 hours.

DOL is also using this change request as an instrument to provide a formal update on action steps for improving the NAWS statistical methodology. This update is in accordance with the clearance terms for this information collection.