

**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 the first interview cycle of fiscal year (FY) 2012, which will end in January 2012; and, depending on the quality of the information obtained, they would be administered in the last two interview cycles of FY 2012 and the first interview cycle of FY 2013. In the pilot phase, these questions would be administered to no more than thirty farm workers.

Information detailing agricultural tasks and personal hygiene practices, which impact the exposures of farm workers to agricultural pesticides, can improve EPA's occupational pesticide risk assessment process. Key stakeholders focused on worker advocacy have repeatedly commented on this topic indicating that the available information is insufficient to fully characterize risks. In December 2008, the Federal Insecticide, Fungicide, and Rodenticide Act Scientific Advisory Panel, convened under the Federal Advisory Committee Act, in discussing the state of the science regarding pesticide exposure measurement, noted the lack of information regarding the amount of time per day farm workers are employed in specific crop-task combinations: <http://www.epa.gov/scipoly/sap/meetings/2008/december/decfinalreport.pdf>

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. The time spent working per day can be used directly in assessments or can be used to better characterize risks for specific hand labor activities (e.g., how many hours an individual harvests a crop per day which is directly used in risk assessment). 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).

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.