Supporting Statement - Part A

Generic Testing - Agricultural Labor Survey

OMB No. 0535-0248

This mini-supporting statement is being submitted to OMB to define the need for conducting cognitive interviews under the Generic Testing docket. No more than 30 operations that are included in the Agricultural Labor Survey (Ag Labor) will be interviewed. This is a follow-up action to the changes made to the questionnaire in the 2012 approval when NASS began collecting two quarters of data at the same time period; changing the Agricultural Labor Survey from a quarterly survey to a semi-annual survey. NASS is following up to ensure that respondents are supplying accurate data and this does not impose any additional burden on them. The cognitive interviews will focus on the currently approved questionnaires, no new questions will be asked.

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.

The Agricultural Labor survey collects data on hired labor, including number of hired workers, type of work, hours worked and wages paid. Respondents are asked to report on this hired labor for two different quarters. NASS preformed behavior coding of telephone interviews for Ag Labor and found that interviewers often used respondents' responses to questions asking about the first quarter to verify their responses to questions asking about the second quarter instead of asking the survey questions a second time. It's unclear the effect this had on data quality. The purpose of the cognitive interviews will be to evaluate the effect of using previously reported data to verify agricultural labor for the second quarter on data quality.

2. How, by whom, and for what purpose information is to be used.

The information gathered through cognitive interviews will be analyzed by our Research and Development Division along with our Environmental and Economic Surveys Section to see if additional modifications need to be made to the questionnaires, Interviewer's Manual and procedures, editing parameters, internet data collection instrument, etc. Approved changes will be implemented into the Ag Labor survey.

3. Use of improved information technology.

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The cognitive interviews will be conducted using face to face interviews.

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

Routine duplication procedures are performed before names were added to our List Frame. No additional efforts will be taken to identify duplication. Operators selected for the cognitive interviews will be drawn from our list of operations who have been sampled for the most recent Agricultural Labor survey.

5. Methods to minimize burden of small businesses.

We will attempt to conduct the cognitive interviews with operations of varying size. Any modifications to the interview process will impact all operations in future Agricultural Labor surveys, regardless of size.

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.

This one time testing data collection will only be conducted during 2015 and/or early 2016.

7. Special circumstances.

There are no special circumstances associated with this information collection.

8. Federal register notice and consultation with outside persons.

Not applicable.

9. Payments or gifts to respondents.

There are no payments or gifts to respondents.

10. Confidentiality provided to respondents.

The same confidentiality that is applied to the Agricultural Labor Survey will be applied to data collected during the cognitive interviews.

11. Questions of a sensitive nature.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The tests will be conducted by trained cognitive interviewers to make sure that the respondents understand the intent of each question and that they are able to provide the requested information. Each interview will last a maximum of 1 hour.

	Number of Respondents	Hours per Interview	Total Burden Hours
Cognitive Testing	30	1	30

Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 30 hours are multiplied by \$25 per hour for a total cost to the public of \$750.

NASS regularly checks the Bureau of Labor Statistics' <u>Occupational Employment</u> <u>Statistics</u>. Mean wage rates for bookkeepers, farm managers, and farm supervisors are averaged to obtain the wage for the burden cost. The May 2014 mean wage for bookkeepers is \$18.30. The mean wage for farm managers is \$34.89. The mean wage for farm supervisors is \$22.86. The mean wage of the three is \$25.35.

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/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.

Costs for conducting the cognitive interviews are estimated at \$ 40,000. This will cover expenses for staff payroll, travel, survey analysis and processing, and any other expenses that may be incurred while updating survey materials based on our findings. Several NASS employees who have been trained in conducting cognitive interviews will travel to the operations in the selected states to conduct the surveys.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).

This mini-supporting statement addresses the use of burden to conduct cognitive testing for the Agricultural Labor Survey.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

No data from this test will be published. Summarized results and information about the cognitive interviews may be presented at national conferences and presented in peer reviewed journals.

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.

There is no request for approval of non-display of the expiration date.

Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

There are no exceptions to the certification statement.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS:

1. Respondent universe, sampling and response rate.

The Ag Labor cognitive testing project would purposefully sample firms identified as having agricultural labor, in locations selected to minimize interviewer travel time and costs.

2. Procedures for the collection of information.

Interviewers will follow standard cognitive interviewing techniques as defined in the original Supporting Statement Part A for the Generic Clearance docket (0535-0248).

3. Information collected adequate for intended uses.

Operations with varying amounts of agricultural labor will be selected for this test. Non-response is not expected to be an issue for this test.

4. Test of procedures or methods.

Not applicable.

5. Individuals consulted on statistical aspects of survey.

We conducted behavior coding on the 2013 Agricultural Labor Survey and found interviewers often used respondents' responses to the previous first reference period to verify their responses to questions which asked about the second reference period instead of asking the questions a second time. The survey administrator for this survey, Julie Weber (202)-720-7216, was consulted regarding these findings; Branch Chief is Marlo Johnson, (202) 720-6263.

Selection of methods of testing and providing of training is done by the Research and Development Division; Senior Cognitive Research Methodologist is Jaki McCarthy, (703) 877-8000.

August, 2015