

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

August 21, 2012

Submitted by:

U.S. Department of Agriculture
Economic Research Service
355 E Street SW, Room 5-232
Washington, DC 20024-3221

Terms of Previous Clearance of This Supplement

In the clearance for the Current Population Survey Food Security Supplement for December 2009, OMB specified the following terms:

- a) Within 30 days of completion of the peer review, ERS will present to OMB the results of the ERS-University of Iowa cooperative agreement work that explores five different alternatives to the current food insecurity classification scheme. OMB will schedule a subsequent meeting to discuss ERS' findings as to the implications of these results for whether, and if so how, the survey should be changed or the data analyzed differently.
- b) Within three months ERS will provide OMB with a summary of the most common misinterpretations of their food security data, their efforts to date in framing the communication of the study results to head off such misinterpretations, and how they will build on their recent experience to prepare for communicating the results of the 2009 survey. ERS will consult with colleagues in other agencies regarding such agencies' experiences with the release of other socioeconomic indicators in order to identify approaches to minimize mischaracterization of results.

In response to term "a," on April 12, 2012, ERS sent to OMB by email a document titled, "Summary of Studies Exploring Potential Technical Enhancements to the Methods USDA Uses to Measure Household Food Security in the United State," which described findings from ERS-Iowa State University research. A revision was sent on April 19, 2012, to include additional material requested by OMB. (See Attachment G). OMB was also represented at an ERS workshop on September 30, 2012, at which the research findings were presented and discussed with ERS staff and researchers from FNS, the National Center for Health Statistics, and the National Center for Education Statistics.

In response to term "b," on March 8, 2010, ERS sent to OMB by email, a document titled "Improving Communication of Food Security Statistics: Common Misinterpretations and USDA Attempts to Prevent Them," which described the extent and character of previous commonly occurring misinterpretations of food security statistics, ERS consultations with colleagues in other agencies regarding their approaches to avoid mischaracterization of results, and ERS plans for actions to minimize misinterpretation in releases of future reports. (See Attachment H).

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 1998-2011, 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 2011 collection

ERS publishes an annual statistical report on the prevalence of food security and food insecurity in U.S. households based on the CPS Food Security Supplement data. These statistics provide information on the need for Federal food and nutrition assistance programs and on how well those programs are functioning. ERS also conducts and funds research on the measurement, causes, and consequences of food insecurity, much of which requires CPS Food Security Supplement data.

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 Supplement is sponsored by USDA as research and evaluation activity authorized under 7 U.S.C. 2204(a) and 7 U.S.C. 2026(a)(1) of the Food and Nutrition Act of 2008. This latter section authorizes the Secretary of Agriculture to enter into contracts with private and public institutions to collect data to undertake research that would improve the administration and effectiveness of the Supplemental Nutrition Assistance Program (SNAP) in delivering nutrition-related benefits. 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 ensure that all of America's children have access to safe, nutrition, and balanced meals by increasing 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 and nutrition assistance programs and comprehensive nutrition education efforts. USDA's 15 food assistance programs, administered by the Food and Nutrition Service (FNS), account for over two-thirds 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 and Nutrition Act of 2008. 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 “anticipate economic and policy issues related to agriculture, food, the environment, and rural development, and conduct economic research that broadly and specifically informs public program and policy decisions.” More specifically, these activities contribute to ERS fulfilling its strategic plan goal 5 (in part): “Improve the nation’s nutrition and health [through] 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. 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 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; conducting research on causes of food insecurity and the role of Federal food and nutrition programs in ameliorating food insecurity; and continuing development and improvement of methods for measuring these conditions.

Information will be collected on food spending, use of Federal and community food and nutrition assistance programs, difficulties in obtaining adequate food during the previous 12 months and 30 days due to constrained resources, and conditions that result from inadequate access to food. Information will be collected by interviewers of the U.S. Census Bureau in early December of each year as a supplement to the Bureau’s monthly Current Population Survey interviews. Information will be collected from one respondent in each household, in either face-to-face or telephone interviews. A de-identified public-use file will be provided by the Census Bureau on its web site. It can be accessed by Government, academic, and private researchers at no cost.

Food security data have been collected in the CPS Food security Supplement since 1995. Data from the first collections were used by USDA and USDA contractors to develop and assess a multiple-item measure of food insecurity at various levels of severity. Data collected subsequently have been used by USDA to improve and expand the statistical measurement methods so as to provide a more complete picture of food security and food insecurity in U.S. households.

USDA has applied these measures to the CPS Food Security Supplement data to provide statistical reports monitoring the extent and severity of food insecurity in the Nation's households annually since 1995. The most recent report, based on the December 2010 survey, indicated that 85.5 percent of U.S. households were food secure throughout the entire year prior to the survey, while 14.5 percent were insecure at least some time during the year, including 5.4 percent with very low food security. Among households with children, 20.2 percent were food insecure, including 9.8 percent in which children, along with adults, were food insecure, and 1.0 percent in which children experienced very low food security. 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.

Food security statistics based on these data are used by USDA to assess progress toward strategic plan objectives. For example, performance measure 4.1.1 in USDA's strategic plan for 2010-2015 is, "Number of U.S. households with very low food security among children, as measured annually with USDA's Food Security Supplement to the Current Population Survey."

Food security statistics derived from the CPS Food Security Supplements are also the basis of two national objectives in the Department of Health and Human Services' Healthy People 2020 Initiative. Food security statistics are reported annually in *America's Children: Key National Indicators of Well-Being*, a report by the Federal Interagency Forum on Child and Family Statistics, and in the *Statistical Abstract of the United States* (U.S. Census Bureau).

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. For example, an ERS research report, *Food Security Improved Following the 2009 ARRA Increase in SNAP Benefits*, published in 2011 used the data to assess effects of SNAP provisions in the American Recovery and Reinvestment Act of 2009 on food spending and food security of low-income households.

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.

The content of the questionnaire proposed for December 2013 is the same as that used in December 2011 and planned for December 2012. The 2013 instrument continues

collection of household food expenditures and program participation information, as in previous years, since these factors are major correlates of food insecurity.

- 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 adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

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 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. The computerized instrument also skips inappropriate questions such as those about children's food security or use of child nutrition programs in households with no children.

- 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.**

Several items collected in this Supplement are collected on other Federal surveys. For example, 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 a subset of the core food security items 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 Early Childhood Longitudinal Study (ECLS)—Kindergarten and Birth cohorts. However, these surveys are designed for specific research purposes, and while they are valuable for studying outcomes of food insecurity, they 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. NHANES has a relatively small sample and data are release only every two years. SIPP has a larger sample, but is longitudinal and has included only a partial food security module and only every several years. The ECLS surveys only cover households with children in selected age ranges and do not assess food security every year. None of those surveys includes the full complement of followup questions on frequency and duration of food-insecure conditions nor the food spending and full range of Federal and community food and nutrition assistance program participation that are included in the CPS Food

Security Supplement, and are important factors to be examined in conjunction with food security.

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 less burdensome to administer than dietary surveys. Consequently, the CPS-based measures lend themselves to use as national monitoring of households' economic access to adequate food.

5. Describe efforts to minimize burden on small business.

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

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. Annual statistics are also needed to track progress toward a USDA strategic plan objective and annual data are important bases for research on economic, demographic, and programmatic factors affecting food security.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the guidelines set forth in CFR 1320.6:

There are no special circumstances.

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.

Notice of Intent to Request Revision and Extension of a Currently Approved Information Collection was published in the Federal Register on May 25, 2012 (Volume 77, Number 102, Pages 31295-31296). A copy of the notice is included as Attachment B. One comment was received and is included as Attachment C. The comment expresses general dissatisfaction with food assistance programs and data collection related to them.

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 research has been completed and reviewed by Dr. Amy Froelich, a statistician at Iowa State University and by Dr. Matthew Johnson, a Statistician at Columbia University Teachers College in New York. Both are specialists in Item Response Theory—the measurement methods that provide the statistical underpinnings of the food security measures—and Dr. Johnson is a nationally recognized authority in that field. Publication of the research is forthcoming as an Economic Research Service technical bulletin, pending final peer review.

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 questionnaire proposed for this data collection (essentially unchanged since 2011) and the burden calculation were reviewed by:

Dennis Clark, Survey Statistician
Demographic Surveys Division
U.S. Census Bureau
301-763-5488

Anita Singh, Chief, Family Programs Evaluation Branch
Office of Research and Analysis
Food and Nutrition Service, U.S. Dept. of Agriculture
703-305-2152

David Holben, Acting Associate Dean
College of Health Sciences and Professions
Ohio University
740-593-2875

Tom Pordugal, Methods Branch
National Agricultural Statistics Service
United States Department of Agriculture
202-690-3623

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

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

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

The Census Bureau will collect the Supplement data in compliance with 13 U.S.C. 182. Each sample household receives an advance letter approximately 1 week before the start of the initial CPS interview. (See Attachment D.) This letter includes the information required by 13 U.S.C. 9, 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 E.) All information given by respondents to Census Bureau employees is held in strict confidence under 13 U.S.C. 9. 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.

De-identified public-use micro-data are released by the U.S. Census Bureau subject to the Bureau's confidentiality policies and only after authorization by the Confidentiality Disclosure Review Board.

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

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.

A) 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.

An estimated 53,935 households will be interviewed each year. Most households will be interviewed one time per year in each of two successive years; the rest will be interviewed only one time. The estimated annual respondent burden is 6,927 hours; an average respondent burden of 7.706 minutes for each of the 53,935 households expected to be in the Supplement universe. The estimate is based on the numbers of households and response patterns in the December 2009 and 2010 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 in each category.

Category, questions administered	Number of respondents	Average time (minutes)	Total (minutes)
1. Supplement Non-Respondents	8,801	1	8,801
2. Higher-income households screened out after food spending questions (average 12 questions)	23,043	6	138,258
3. Households with children and either lower-income or screened in after food spending questions (average 32 questions)	8,517	14	119,238
4. Households with no child and either lower-income or screened in after food spending questions (average 24 questions)	13,574	11	149,314
Total	53,935		415,611
Average burden per household (minutes)			7.706
			Total (hours)
Total burden (hours)			6,927

About 59 percent of the sample is expected to fall in the first two categories. These will include Supplement non-respondents and households with incomes above 185 percent of the poverty line who indicate no food security problems on questions S9 and SS1 and therefore answer only the food expenditure and food sufficiency questions (S1 to S9 and SS1). Lower-income households and households screened in based on S9 or SS1 (categories 3 and 4) will also answer questions about their food security and use of food

and nutrition assistance programs. The number of questions these households answer depends on whether the household includes children and on how food-insecure the household is, as questions about more severe conditions are screened based on responses to questions about less severe conditions. Based on responses in the 2009 and 2010 surveys, households with children (category 3) will answer, on average, 32 questions and those with no child (category 4) will answer, on average 24 questions.

Average times are based on timed readings of questions and typical responses.

B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

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 \$136,462. Cost of respondents' time is estimated based on the average hourly wage for production and non-supervisory private-sector workers (\$19.70 per hour in May 2012, as estimated by the U.S. Bureau of Labor Statistics) multiplied by the total response time for all respondents (6,927 hours)

- 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 and any other expense that would not have been incurred without this collection of information.**

The cost to the Government of the Current Population Survey program of data collection, to which this collection is a supplement, 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 2012, including related development costs and public-use data provision costs, to be \$600,000

in fiscal year 2013. This cost is borne by ERS and supported through an interagency transfer to the Census Bureau.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

Total estimated burden for the December 2012 supplement is slightly higher (by 12 hours or 0.2 percent) than that estimated in the previous submission for this Supplement (2009). The change is due to an increase in the proportion of households with low income—thus answering a larger number of questions and increasing the burden per respondent by 1.1 percent—largely offset by a decline in the CPS sample size of 0.9 percent.

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

The December CPS, of which this Supplement is a part, will be conducted during the second week of December each year. Processing of the Supplement data by the Census Bureau will begin in December, and the edited and de-identified data will be released to ERS in mid-April. Publication of the annual food security report by ERS and release of public-use data files by the Census Bureau are scheduled for early September, about nine months after collection of the data.

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 Current Population Survey, of which this is a supplement, does not display the assigned expiration date of the information collection because the instrument is automated and the respondent, therefore, would never see the date. Instead, the OMB control number for the CPS is included in the survey's advance letter. (See Attachment D.)

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

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

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