

National Agricultural Workers Survey, OMB No. 1205-0453

Justification for Request for Minor Changes to Approved Questions

The Department of Labor, Employment and Training Administration (ETA) and the Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health, Division of Safety Research (DSR) are proposing two minor changes to the currently-approved injury and musculoskeletal (MSK) supplements of the National Agricultural Workers Survey (NAWS). The proposed modifications will allow DSR to: 1) more accurately assess the magnitude and burden of occupational injuries and MSK problems in this population; 2) examine the relationship between MSK problems and occupational injury and determine appropriate interventions; and 3) prioritize, target, and develop effective prevention strategies for vulnerable workers, in both agriculture and other industries.

The injury and MSK supplements were last administered in the NAWS in Fiscal Year 2010 under Information Collection Request (ICR) reference number 201003-1205-005. The NAWS questionnaire and its supplements were subsequently revised, and the current NAWS questionnaire, which does not include the injury and MSK supplements, is approved until August 31, 2015 under ICR reference number 201202-1205-004.

Authorization to administer the revised supplements, which yield a relatively small number of cases compared to the survey's general questions, is being sought to take advantage of a forthcoming increase in the survey's sample size. In Fiscal Year (FY) 2014, the sample size will increase from 1,500 to 3,000 interviews. This increase is expected to yield a larger number of injury and MSK cases, which will permit DSR to generate more robust national estimates of injury and MSK rates and identify risk factors more quickly.

Collection of occupational injury and health data is authorized under the Public Health Services Act, as amended, Section 301 (a) (42U.S.C. 241(a)), and the Occupational Safety and Health Act of 1970, Sections 20(a) and 22 (29U.S.C. 669(a) and 671). The applicable regulation is 42 CFR Part 52. Collection of this data is also authorized by statute in the 1997 Omnibus Consolidated Appropriations Act (PL-104-208).

Justification for Modifying the Occupational Injury Supplement

DSR began using the NAWS in FY 1998 to conduct occupational injury surveillance among hired crop farm workers. The surveillance has been limited to injuries associated with agricultural employment. **Beginning with the October 2013 interview cycle**, DSR would like to expand the surveillance to include all occupational injuries occurring in this population. This expansion is necessary because a significant share of farm workers, nearly 20 percent, hold non-farm jobs and non-farm injuries may be a risk factor for agricultural work injuries. Collecting information on all occupational injuries experienced by farm workers will enable the DSR to more closely examine the relationship between agricultural and non-agricultural work injuries and determine appropriate interventions.

Identifying the occurrence of non-farm occupational injuries will be facilitated by modifying the interviewer dialogue that precedes the screening questions for a qualifying injury (**see the highlighted portion of the NAWS Injury Screening and Supplement**). Rather than asking respondents to think only about injuries that occurred while working on a farm or traveling to or from a farm job, they will be asked to think about all occupational injuries they might have had while on a farm or other place of work, while working or not, or while traveling to or from a farm or other place of work. As before, the look-back period for a qualifying injury will be twelve months. Once a qualified injury is identified, the same information will be collected for farm and non-farm occupational injuries. When respondents report a non-farm injury, however, NAWS interviewers will make note of the occupation and industry in the narrative section of the injury module (**see the highlighted areas on pages 3-4 of the NAWS Injury Screening and Supplement**).

Justification for Modifying the Musculoskeletal Supplement

Associated with the revised injury supplement, ETA and DSR are requesting approval to obtain two new pieces of information from the MSK supplement (**see the highlighted portion of the Musculoskeletal Supplement**). Specifically, when a respondent attributes MSK pain to farm work, the interviewer would ask the respondent about the specific crop and task the worker was performing when the pain began. For non-farm jobs, the interviewer would ask about the worker's job title (occupation) and industry.

Approval to obtain this additional information is being requested to facilitate the identification of occupational tasks that are associated with MSK problems and determine appropriate prevention strategies. MSK problems are the most common health outcome reported by hired farm workers, and they are risk factors for occupational injury in other industries. As such, the identification of tasks that are related to MSK problems holds promise for reducing both agricultural and non-agricultural injuries.

Revised Burden Estimates

Six factors account for an increase of 1,706 burden hours from the currently approved inventory of 1,693 to the new request of 3,399 (see Table 1 below): 1) an additional 1,500 farm workers will respond to the primary questionnaire; 2) an additional minute per farm worker respondent will be required to complete the primary questionnaire due to the screening questions for a MSK problem and an occupational injury; 3) an estimated 106 farm worker respondents will report a qualifying injury¹; 4) an estimated 480 farm worker respondents will report a MSK problem²; 5)

1 Based on current NAWS injury findings, approximately 3 percent of the 3,000 respondents (90 farm workers) will report an agricultural occupational injury. In addition, at estimated 16 farm workers will report a non-farm injury. This latter estimate is based on the finding that 18 percent of NAWS respondents hold non-farm jobs, i.e., 540 workers if the sample size is 3,000, and the assumption that 3 percent of these (16 workers) will report a non-farm injury. It is assumed that the worker-based injury rate for farm and non-farm jobs will be 3 per 100 workers, or 3 percent.

2 Based on NAWS MSK findings, approximately 16 percent of the 3,000 respondents (480 farm workers) will

an additional 300 farm worker parent respondents will complete the currently approved Migrant and Seasonal Head Start supplement³; and 6) an additional 374 agricultural employers will need to be contacted to interview an additional 1,500 farm workers⁴.

Table 1. Change in Burden Hours Associated with the FY 2014 NAWS

Respondent Type	Respondents per Year		Average Time per Respondent (minutes)		Total Hours		Change
	Current	New	Current	New	Current	New	FY 2014
Farm workers	1,500	3,000	59	60	1,475	3,000	+ 1,525
Farm workers with a qualifying injury	0*	106*	0	10	0	18	+ 18
Farm workers with a musculoskeletal problem	0*	480*	0	1	0	8	+ 8
Farm worker parents with children less than six years old	300*	600*	6	6	30	60	+ 30
Employers	564	938	20	20	188	313	+ 125
Total	2,064	3,938			1,693	3,399	+ 1,706

* Not included in total respondents; they are a sub-set of the Primary Questionnaire respondents.

report a MSK problem.

³ Based on NAWS findings, approximately 20 percent of the 3,000 respondents (600 farm workers) will be parents who have children under the age of six.

⁴ In FY 2012, 1,506 workers were interviewed on 222 farms, or about 6.8 workers per farm. A total of 477 farms were determined to be eligible for participation, meaning that farm workers were employed there when interviewers arrived to speak with the employer. Interviews were conducted at 222 of the eligible farms, for a grower response rate of 47 percent (the grower cooperation rate was higher, at 63 percent). To collect information from 3,000 farm workers in FY 2014, sampling will need to occur at approximately 441 establishments. Assuming the employer response rate will be at least 47 percent, 938 eligible establishments will need to be approached and invited to participate.