

Supporting Statement – Part A

PESTICIDE PROTECTION EQUIPMENT PRACTICES AMONG PENNSYLVANIA FARMS SURVEY

OMB No. 0535-NEW

This supporting statement addresses the new data collection efforts for the Pesticide Safety Practices Among Pennsylvania Farms Survey for a period of three years. This will be a pilot study. This project will concentrate on assessing pesticide safety practices among Pennsylvania crop farm operators who have personally applied pesticides for crop production using methods other than aerial applications and enclosed cab vehicles. The reference period will be pesticides applied during the crop year 2014. Data collected under this docket is for a cooperative agreement between the National Agricultural Statistics Service (NASS) and the National Institute for Occupational Safety and Health (NIOSH), National Personal Protective Technology Laboratory (NPPTL). NIOSH will be substantially involved throughout the development and implementation of the survey program. Depending on the results of this pilot study and availability of future funding, this survey may be expanded to other States in the U.S.

The purpose of the study is to determine the correctness of pesticide personal protective equipment (PPE) practices used by Pennsylvania crop production farmer applicators (PPE practices), and when applicable, identify the barriers to using correct pesticide PPE practices (barriers), and factors that may motivate an applicator to start using correct pesticide PPE practices (motivators). The data will identify the types of incorrect pesticide PPE practices used by Pennsylvania crop production farmer applicators, as well as, the opportunities (e.g., barriers and motivators) to improve their PPE practices. NIOSH and its stakeholders will then use this information to design novel science-based interventions. These interventions are expected to reduce some key barriers to using correct pesticide PPE practices that PA crop production applicators are facing and also provide PA crop production applicators with some incentives to start using correct pesticide PPE practices. If these novel interventions are successful, they are expected to reduce the risk of pesticide exposure and related illnesses among Pennsylvania crop farmer applicators.

This pilot study has the following objectives to help NIOSH plan and conduct a more efficient and effective future study of an expanded population with respect to sampling, screening, and data collection methods:

1. To determine whether the expected response rate to phase I questionnaire is 80% or higher, in order to design a more cost-effective and efficient main study with respect to the screening methods.

2. To obtain the eligibility rates in the sample, in order to design a more cost-effective and efficient main study with respect to the screening methods.
3. To determine the adequacy of completion rates on the phase I questionnaire, in order to assess whether it is a sufficient method for determining respondent eligibility.
4. To assess the response rates overall, and those of the barrier and motivator questions on the phase II questionnaire, in order to determine whether this questionnaire and the barrier and motivator items are effective in obtaining the data.
5. Provide preliminary comprehensive data on the extent of correct personal protective equipment practices, and barriers to and motivators of correct personal protective equipment practices to better inform the need and scope of the main study.

Attached to this submission is a listing of citations that NIOSH used to document statements made throughout this supporting statement.

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 goal of this NASS information collection is for NASS to assist the National Institute for Occupational Safety and Health (NIOSH) in its efforts to reduce the risks of illness and injury associated with pesticide exposure due to incorrect personal protective equipment (PPE) practices. NIOSH is mandated to conduct research and make recommendations for the prevention of work-related disease and injury under Section 20 of the Occupational Safety and Health Act, 29 U.S.C. 669 and Section 501 of the Federal Mine Safety and Health Act, 30 U.S.C. 951. PPE is almost always relied upon as a critical last line of defense to protect workers from pesticide exposures because engineering and administrative controls don't always work in agriculture. PPE is proven effective in reducing pesticide exposure¹⁻², but only if the correct type is used and used properly. Current limited data suggests that many pesticide applicators are not using correct pesticide PPE practices. Due to the toxic nature of pesticides and potential risks of illnesses³⁻¹⁶, a comprehensive study of correct PPE practices, which includes both correct type of PPE and its proper use, is urgently needed. This pilot study will provide the first comprehensive data on the extent to which correct pesticide PPE practices are being used, as well as any barriers to correct PPE practices and motivators of correct practices.

NIOSH has asked NASS to assist in this data collection effort by identifying the population of Pennsylvania crop production farms from the 2012 U.S. Census of Agriculture data. In addition NASS will provide a sample of 3,000 farm operators to assure appropriate representation from diverse crop production farms; screen operators from the sample for their eligibility and interest in participating in this survey program; interview eligible volunteers; interview and collect data from 240 operators; and provide NIOSH with a data set with all Personally Identifiable Information (PII) removed for them to analyze. General authority for these data collection activities by NASS is granted under U.S. Code Title 7, Section 2204(a) which specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturists." The primary functions of the National Agricultural Statistical Service (NASS) are to prepare and issue official State and National estimates of crop and livestock production, disposition, and prices, and to collect information on related environmental and economic factors. Auxiliary services such as statistical consultation, data collection, and summary tabulation are performed for other Federal and State agencies on a reimbursable basis. Due to NASS's ability to sample and interview the population of crop producing operations in Pennsylvania, NIOSH has asked NASS to conduct a pilot study of pesticide safety practices, e.g., Pesticide Safety Practices Among Pennsylvania Farms Survey.

The target population for the Pesticide Safety Practices Among Pennsylvania Farms Survey is the group of Pennsylvania crop production operators who personally applied pesticides for crop production using methods other than aerial applications and enclosed cab vehicles in the 6 months prior from the time of the screening. Pesticides include any herbicide, growth regulator, insecticide, rodenticide, fungicide or fumigant. NASS will draw a stratified random sample of 3,000 Pennsylvania crop farms, using data from the 2012 U.S. Census of Agriculture. The 2007 Census of Agriculture identified 54,772 farms in Pennsylvania who produced crops.

An operator from each of the 3,000 farm operations will then be contacted by mail and asked a series of screening questions (e.g., whether they *personally* applied any pesticides in the past 6 months using methods other than aerial and enclosed cab vehicles). They will also be asked to provide the approximate dates of up to 3 of the most recent applications, including pesticides product names, EPA registration numbers, and approximate date(s) of purchase. In the second phase of the study, NASS will interview eligible and interested participants. Eligible participants will have provided the name, EPA registration number and approximate purchase date for at least one pesticide they personally applied for crop production within the 6 month reference period using a method other than aerial applications or enclosed cab vehicles. Also, in the second phase of the study, an interview will be conducted and the following information assessed (as appropriate) 1) characteristics of the pesticide applicator, 2) characteristics of the

most recent pesticide application, 3) characteristics of the personal protective equipment used and how it was used during the most recent pesticide application, and 4) perceived barriers to and motivators of correct PPE practices.

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.

This pilot study involves 2 surveys:

- A. The Phase I screening survey to identify if the respondent is included in the population of interest: Pennsylvania crop production farm operators who personally apply their own pesticides using methods other than aerial applications or enclosed cab applications within the past 6 month. The Phase I screening version will be done using a 2-page self enumeration questionnaire to determine if the respondent is in the population of interest and chemicals applied. It is unknown what proportion of operators are in the population of interest.
- B. Once it is determined the respondent is in the population of interest, a Phase II more complex survey will be interview-administered. The 42-page questionnaire with multiple flow statements and respondent aids does not allow for self enumeration. This is the focus of the pilot study. Because of the time and mileage cost to travel to the respondent, we want to make sure the respondent is in the population of interest.

This study has three objectives, including 1) to determine the extent to which Pennsylvania pesticide applicators use correct pesticide PPE practices, and when applicable, 2) to identify reason(s) for incorrect PPE practices (e.g., barriers); and finally, when applicable, (3) to identify factors that may motivate a farmer to adopt correct practices (e.g., motivators). The first objective will characterize the types of incorrect PPE practices and their frequency. Findings related to the first objective will be used by numerous diverse educators and trainers around Pennsylvania to help them prioritize their training programs and to better select educational materials that focus on the most significant issues identified. Educators and trainers who will use this information include those individuals or agencies who teach credit classes required of licensed applicators, or are otherwise responsible for training to ensure the safety and health of pesticide applicators. Examples include Pennsylvania State University Cooperative Extension Service, private trainers, numerous pesticide and PPE manufacturers and suppliers, and Pennsylvania Department of Agriculture, and the Office of Rural Health. Findings related to the second and third objectives on barriers to and motivators of correct PPE practices will be used by NIOSH and its diverse stakeholders to design novel interventions that aim to reduce the barriers that were reported to result in incorrect pesticide PPE practices and exploit the factors that were reported to

motivate correct pesticide PPE practices. Diverse stakeholders who will design and/or use novel interventions may include the Environmental Protection Agency (EPA), Pennsylvania Department of Agriculture, Pennsylvania Office of Rural Health, Pennsylvania/USDA Extension Service, numerous pesticide manufacturers and suppliers, personal protective equipment (PPE) manufacturers and suppliers, researchers, clinicians, and Pennsylvania crop producers.

Over the past 3 years, the NIOSH National Personal Protective Equipment Surveillance and Intervention Program among Pesticide Handlers has spoken informally with thousands of pesticide handlers to better understand why some pesticide handlers do not use correct PPE practices. This preliminary information, pending verification in the *Pesticide Safety Practices Among Pennsylvania Farms Survey* suggests there are three categories of barriers to using correct PPE practices: (1) a lack of knowledge of correct PPE practices, (2) not being able to obtain correct PPE, and (3) correct PPE practices not being accepted. Interventions will be designed to address different types of barriers to using correct PPE practices. Examples of interventions that address barriers and motivators related to the lack of knowledge issue include enhanced training and improved educational materials which may include new “hands on” training materials tailored to a particular practice that was often done incorrectly by pesticide applicators. These new tools will be used by a wide range of stakeholders who provide training to applicators or produce the educational materials they use. Examples of interventions that address barriers and motivators related to not being able to obtain correct PPE may include the development of informational kiosks within retail stores where PPE is sold and changing the language on the PPE product packaging so that it provides criteria specific to the needs of customers who apply pesticides. Suppliers and manufacturers will be most likely interested in using these types of interventions. Examples of interventions that address barriers and motivators related to correct PPE practices not being acceptable to pesticide applicators may involve capturing stories to be used in trainings to raise awareness of the potential detrimental effects of working with pesticides and the potential benefits of using correct PPE practices. Diverse educators and trainers, including employers, will use these types of interventions. Through the design and use of novel inventions and enhanced training programs and educational materials, the findings of this pilot study are expected to improve PPE practices among Pennsylvania crop producers and reduce their risk of pesticide exposure and related illnesses resulting from unsafe pesticide applications.

In this pilot study NIOSH will be using a unique method of data collection. This will be a dynamic survey that will accomplish 2 functions:

1. The respondent and interviewer will assess correct PPE at the time of interview, and
2. If the respondent did not utilize proper PPE, determine barriers to using correct PPE

This has not been done before. At this time, no other data collection methods are planned for analysis other than field enumeration. The complexity of the survey, illustrations and references for various types and levels of protective equipment, does not allow for self-enumeration or telephone interviewing. The attached Respondent Reference Sheet will be used during the phase 2 portion of the survey to help ensure clarity of the questions.

- 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 pilot study involves 2 surveys:

- A. The Phase 1 screening questionnaire is short and delivered and returned via the U.S. Postal Service mail, involving minimal burden. NASS will key the Phase I screeners that are returned.
- B. The Phase 2 questionnaire is necessarily collected face-to-face and involves the use of visual aids by a trained NASDA enumerator. NASS will key the 300 Phase II questionnaires.

Data collection does not currently involve the use of electronic submission of responses or other information technology to reduce burden. The expenses associated with utilizing other forms of technology to reduce burden, such as making this interviewer administered survey electronic, would be cost prohibitive for this pilot study.

If the pilot study is successful, the improved questionnaire will be used in surveys that cover larger regions and perhaps the entire country. Future studies, if funded, may utilize CAPI and Internet technology.

- 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.**

No prior study has comprehensively assessed the extent to which pesticide handlers are using correct PPE practices as required according to pesticide label for different types of PPE. Existing data indicates that many pesticide applicators are not using correct PPE practices¹⁷⁻²³. Furthermore, these data may underestimate the extent of incorrect PPE practices being used. For example, Tondl and colleagues (2000)²³ asked a pesticide handler to report whether they wore what was required on the pesticide label²³. This is not the most accurate

method to assess correct PPE practices, since preliminary information suggests that pesticide handlers do not often read the label for the PPE requirements and do not often understand the label requirements well enough to interpret them correctly²⁴⁻²⁵. Prior studies have not assessed whether the PPE was used properly²³, as exposure may occur even with correct PPE when not used properly. Furthermore, to the best of our knowledge, there are no existing data to indicate barriers to and motivators of specific incorrect PPE practices. Due to the limitations of existing data, new data are needed.

Data comparing the pesticide PPE used by an operator to what is required on the pesticide label, as well as how PPE is used must be obtained from farm operators. NASS is the source of the US Census of Agriculture and can sample the population of Pennsylvania crop producers efficiently and effectively to meet the needs of this pilot study. NASS cooperates with State Departments of Agriculture, land grant universities, and other State and Federal agencies to conduct surveys. Wherever possible, surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. This survey will serve as a pilot nationally, which may be subsequently implemented in other states depending on the results and availability of future funding.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection will not have a significant economic impact on 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.

Without the pilot study on personal protective equipment practices, barriers and motivators among Pennsylvania pesticide applicators, NIOSH is not able to verify whether these applicators are using correct practices and potentially at increased risk for pesticide exposure and related illnesses. Without proper information on barriers and motivators, educators and trainers are unable to significantly improve their training programs and educational materials. Furthermore, NIOSH and its stakeholders would be unable to effectively design new science-based interventions that could significantly improve PPE practices. As a result, NIOSH's ability to effectively meet its mandate for protecting workers (in this case pesticide applicators) from their risk for illnesses and injuries on the job (Section 20 of the Occupational Safety and Health Act, 29 U.S.C. 669 and Section 501 of the Federal Mine Safety and Health Act, 30 U.S.C. 951) would be significantly compromised.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no special circumstances associated with this information collection.

- 8. 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.**

The Notice soliciting comments was published in the Federal Register on May 7, 2013 on pages 26611-26612. NASS received one public comment from Ms. Jean Public; her comment and NASS's reply are both attached to this docket.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Over a 3-year period, NIOSH undertook extensive preliminary research and consulted with hundreds of expert stakeholders to assure the non-redundancy of the data collection effort, and that the data will be collected, recorded, disclosed, and published in a manner that is appropriate and needed. NIOSH conducted a comprehensive literature review (2009-2013). NIOSH held multiple national stakeholder meetings involving 100s of agencies and individuals, on the state of the knowledge on pesticide PPE practices, barriers, and motivators. Stakeholder meetings include a series of 8 monthly meetings (2010), two meetings of the National Training Solutions Committee (2011 and 2012), three annual meetings (2011-2013), and 8 meetings of the Pesticide PPE Seminar Series (Fall 2011-Spring 2013). NIOSH also conducted a series of two external/stakeholder reviews of the questionnaire in 2011 and two in 2012. Stakeholders from Pennsylvania and nationally were involved in these meetings and included the Environmental Protection Agency (EPA), Departments of Health and Agriculture, Pennsylvania Office of Rural Health, Pennsylvania/USDA Cooperative Extension Service, pesticide manufacturers and suppliers, personal protective equipment manufacturers and suppliers, researchers, clinicians, crop producers, and pesticide handlers. Stakeholder consensus is that the findings of this study will be presented in multiple national stakeholder meetings and published as two or more articles in peer-reviewed scientific journals. As a result of this preliminary research/work, NIOSH is confident that this pilot study will effectively fill an important research gap/need.

- 9. Explain any decision to provide any payment or gift to respondents.**

No payment or gifts will be provided to respondents.

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

Questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance.

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

The following CIPSEA Pledge statement will appear on all NASS questionnaires.

The information you provide will be used for statistical purposes only. In accordance with the Confidential Information Protection provisions of Title V, Subtitle A, Public Law 107–347 and other applicable Federal laws, your responses will be kept confidential and will not be disclosed in identifiable form to anyone other than employees or agents. By law, every employee and agent has taken an oath and is subject to a jail term, a fine, or both if he or she willfully discloses ANY identifiable information about you or your operation.

Minor changes were made to the wording of the pledge so that it would be consistent with NASS procedures.

11. Provide additional justification for any questions of a sensitive nature.

Some questions may be considered sensitive, with minimal psychological risks to the respondent. A respondent may learn that they were not using correct PPE practices, such as questions 133, 140, 147, 154, 161, and 168, and become concerned or anxious. In some cases, these questions may be interpreted by the respondent positively, because they have learned information about protecting themselves and their family members. Respondents may also become anxious when discussing potential health risks to self or family, as well as their potential risk for citation. For example, Question 103, in Section C.5. of the questionnaire, lists factors that may cause the respondent to start inspecting their gloves,

including “Learning that gloves with only minor damage or wear can allow pesticides to get on your skin”, “Learning that pesticides which get on your skin can potentially harm your health”, and “Learning that pesticides which get on your skin can be transferred to your family”. In another example, question 123, in Section C.6. of the questionnaire, factors that may cause the respondent to get tested to assure their respirator fits them are listed, including “Learning that wearing a respirator with, even very small air leaks, can be harmful to your health”. A third example is Question 130, in Section D of the questionnaire, which lists possible reasons for reading the personal protective equipment (PPE) section of the pesticide label and includes “Learning that wearing personal protective equipment and clothing which is less protective than required by label can allow you to be exposed to a pesticide”, “Learning that you can transfer pesticide residues on you to your family” and “Learning that you could be cited for wearing personal protective equipment and clothing which is less protective than required by label.” However, none of the questions address a specific illness or exposure.

These questions are needed to effectively identify possible barriers and motivators of correct PPE practices. Information on barriers and motivators are necessary to design interventions aimed at improving PPE practices. To deal with the potential sensitivity, the trained NASS enumerator will be trained on the potential sensitivity and to identify participants who may be affected by questions and to address potential sensitivities. The protocol will offer the respondent an opportunity to take a break, skip a question or series of questions. The interviewer will also assure the respondent that all answers will be kept confidential and may not be used to identify individual participants. If the situation is extreme, the interviewer will ask whether the respondent wants to continue the interview.

Early in the Phase II questionnaire, there are questions on number of children under 19, beard of a certain type, marital status, risk-taking behavior, etc. These questions/variables assess characteristics of pesticide applicators in the sample and are important from an epidemiological perspective. These applicator characteristics help us define our sample and evaluate comparability of results across samples. These characteristics may contribute to incorrect personal protective equipment practices and we will be able to analyze those relationships. Obtaining a better understanding of these relationships is helpful for developing and implementing effective and efficient interventions to improve personal protective equipment practices.

- 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.

NIOSH consulted with the Research Triangle Institute (RTI) and conducted cognitive interviews on 6 pesticide applicators and the estimated average time to complete the Phase II questionnaire was 50 minutes due to the various skips. As a result, NIOSH made appropriate adjustments to improve the Phase II questionnaire prior to this pilot study. None of the applicators refused or reported an issue with any of the questions. During the cognitive testing RTI was concerned with the quality of certain responses to the barriers and motivator questions which lie at the end of selected sections (Sections C 5-6, D, and E 1-6). As such, NIOSH worked with RTI and made adjustments and improve those questions. Based on the cognitive test results, all respondents should be able to complete all the required sections (A, B, relevant C sections, and D) with minimal effort. Since questions on barriers and motivators fall at the end of a given section/subsection, if there is difficulty with the questions, the interviewer should very easily navigate to the next section/subsection that is applicable. When section E is applicable, the potentially challenging questions fall at the end of a given section and are easy to skip over if needed. It would not be necessary to try to divide the phase II questionnaire up into subparts for pilot testing.

Response burden hours are shown in the table below. The projected response rate was based on a targeted response rate of 80% for the permission forms and final survey.

Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. The annual, estimated reporting time of 822 hours is multiplied by \$25 per hour for a total cost to the public of \$20,550. NASS regularly checks the Bureau of Labor Statistics' [Occupational Employment Statistics](#). Mean wage rates for bookkeepers, farm managers, and farm supervisors are averaged to obtain the wage for the burden cost. The May, 2012 mean wage for bookkeepers is \$17.62. The mean wage for farm managers is \$35.45. The mean wage for farm supervisors is \$22.31. The mean wage of the three is \$25.13.

Estimated Sample Size and Respondent Burden for the 2014 Survey

| Survey | Sample Size | Freq | Responses | | | | Non-response | | | | Total Burden Hours |
|--|-------------|------|-------------|--------------|-------------|--------------|---------------|--------------|-------------|--------------|--------------------|
| | | | Resp. Count | Freq x Count | Min./ Resp. | Burden Hours | Nonresp Count | Freq x Count | Min./ Nonr. | Burden Hours | |
| Screening Phase in October | 3,000 | 1 | 2,400 | 2,400 | 15 | 600 | 600 | 600 | 2 | 20 | 620 |
| Main PPE Field Enumerated Survey In November | 300 | 1 | 240 | 240 | 50 | 200 | 60 | 60 | 2 | 2 | 202 |
| Total | 3,000 | | 2,400 | 2,640 | | 800 | 600 | 660 | | 22 | 822 |

13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection of information.

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

The projected total cost to the Federal government to conduct the Pesticide Protection Equipment Practices Among Pennsylvania Farms Survey is approximately \$145,000 for fiscal year 2014, most of which is staff costs.

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 is a new request, so there is no current inventory.

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.

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|---|-----------------------|
| Phase I Screening Survey & Questionnaire Design | August-December, 2012 |
| Phase II questionnaire design..... | January-April 2013 |
| Sample selection..... | April 2014 |
| Administer the Phase I Screening Survey..... | October, 2014 |
| Administer the Phase II Field Enumerated Survey 2014 | November/December |
| Data Collection Ends..... | January 2015 |
| Data Entry and Management..... | January-May 2015 |
| NIOSH Analyzes Data..... | June-December 2015 |
| NIOSH Publishes First Manuscript..... | June 2016 |
| NIOSH Publishes Second Manuscript..... | December 2016 |

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.

No approval is requested for non-display of the expiration date.

18. 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.

November, 2013

Revised April, 2014