

Supporting Statement
National Agricultural Workers Survey:
Office of Management and Budget (OMB) Control No. 1205-0453
July 2015

Introduction

The Department of Labor (DOL), Employment and Training Administration (ETA) requests approval to make several changes to the National Agricultural Workers Survey (NAWS) questionnaire. NAWS is a survey of the demographic, employment, and health characteristics of hired crop farm workers. The proposed changes are as follows:

- Discontinue the Environmental Protection Agency (EPA)-sponsored seven-item supplement on worker hygiene, which was administered for two years and has fulfilled its purpose;
- Temporarily discontinue the National Institute for Occupational Safety and Health (NIOSH)-sponsored 22-item occupational injury supplement and 36-item musculoskeletal (MSK) supplement, while NIOSH considers new strategies for conducting surveillance of injuries and MSK outcomes in the agricultural worker population;
- Discontinue 17 other questions that either had too few responses to be useful for analysis, will be redundant with proposed changes, or are no longer relevant;
- Modify the stem and/or response options for six questions to make them clearer and more useful;
- Expand the education and training content by replacing two questions with 13 questions on training and one question on educational degrees obtained;
- Add five questions on access to and use of digital information devices;
- Add a question to ascertain if the farm worker lives in a labor camp or migrant center;
- Add two screening questions for an occupationally relevant health condition: General Anxiety Disorder (GAD);
- Modify and expand the lifetime health conditions grid as follows:
 - Include cancer and high cholesterol, which are currently the two most frequent “other” responses, as individual items;
 - Add HIV to the list of conditions;
 - For women, ask if they ever received a cervical cancer screening test and clarify if diabetes was gestational;
 - For eight of the 11 conditions, add columns to the health grid to ask if the respondent was ever tested for the condition, and if “yes”, the outcome of the test, and when and where the last test was taken;
- Modify and expand the existing health care access questions to obtain more detailed information on farm workers’ access to acute, preventive, and dental care;
 - Expand the options for the health barriers and better route respondents through the question depending on their past experiences with the U.S. health system;
 - Extend questions on health care utilization to spouses and children of farm workers; and
 - Modify the question on payment source for the most recent health care visit.

DOL/ETA is seeking approval to administer the revised instrument for three years. The proposed deletions, additions, and modifications have been carefully balanced, resulting in no change in the average time, per respondent, to administer the instrument. Increases in farm worker and employer sample sizes, and decreases associated with the temporary discontinuation of the NIOSH-sponsored supplements, result in a net increase of 528 burden hours.

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.

Collection of information on the U.S. hired farm labor force is necessary to monitor the terms and conditions of agricultural employment and to evaluate the human resources that are vital components of the nation's thriving agricultural sector.

NAWS data are essential for understanding changes in and estimating the sizes of populations eligible for assistance via farm worker and farm worker-related programs. The Federal Government currently allocates approximately \$1 billion per year to such programs, including those administered by the Department of Health and Human Services (HHS) (Migrant Health and Migrant Head Start), the Department of Education (ED) (Migrant Education) and DOL (National Farmworker Jobs Program). As the only national information source on the employment, demographic, and health characteristics of hired crop workers, NAWS data are central for informing these programs. The Wagner-Peyser Act, as amended (29 USC 49f (d) and 49f -2(a)), authorizes DOL to collect this information. (ETA will receive funding from various sources to support its collection of this information.)

The additional questions on participation in education and training programs are important because research shows that participation in some types of adult education is associated with increased earnings and more weeks of employment. However, few studies have examined how adult education programs targeting migrant and seasonal farm workers (MSFW) affect labor market outcomes in this population (Alves Pena, 2011). This is partly due to the lack of available analysis data. The current NAWS questions on education and training programs are broad and cannot be used to isolate the effects of participation in particular types of education and training, the duration of participation in such programs, or whether the individual completed and achieved a credential or a license from their participation in the program. The proposed questions will fill this gap.

The questions will provide the data necessary to examine the effects of participation in adult education programs, including programs funded by the National Farmworker Jobs Program (NFJP). The NFJP, which was recently reauthorized under the Workforce Investment and Opportunity Act, helps MSFWs develop skills that can be used in complementary occupations during agricultural off-seasons to increase their economic stability.

The proposed questions on digital literacy will provide valuable information on an important cross-agency federal digital initiative, described in the *National Broadband Plan*. This plan envisions universal access to and use of broadband internet technologies in a variety of domains including health care, education, and commerce. The NAWS digital literacy supplement will provide key information about the evolving picture of broadband access and digital literacy in the United States for the population of MSFWs and their families.

The proposed questions are parallel to ones used in other national and international surveys such as the Program for International Assessment of Adult Competencies (PIAAC), the Current Population Survey (October Supplement on Education and Internet Use), the Pew Survey on Health Tracking and Internet Use, and the Federal Communications Commission Consumer Survey of Broadband Use and Adoption. These other surveys, however, do not provide adequate coverage of the MSFW population. The proposed digital literacy questions will thus add important coverage of this population.

The information on digital literacy will depict the distribution of broadband and information technology access in the migrant and seasonal farm worker population. This information will support the development of technology-based products and services that can reach and assist these workers and their families in areas of safety, education and training, health care, housing, and employment.

The proposed questions on quality and access to health care will cover routine, preventive and dental care for farm workers, spouses and children. In addition, the questions on farm workers' health history will provide data to measure the prevalence of heart disease, asthma, cancer, high blood pressure, cholesterol, diabetes, AIDS, and other illnesses. This information on quality and access to health care in general, but in particular the expanded questions to capture information about spouses and children, is important because it will improve the Health Resources and Services Administration's (HRSA) ability to understand the barriers farm workers and their families face in accessing comprehensive, affordable, and culturally and linguistically effective health care services.

As mentioned above, the NAWS collects information on several health conditions. The proposed questions on Generalized Anxiety Disorder (GAD) are needed to improve understanding of farm worker mental health. Available evidence suggests that poor mental health is common among farm workers. Previously identified environmental stressors confronted by farm workers include restricted social mobility, discrimination, dangerous working conditions, financial uncertainties, language difficulties, and concerns related to documentation. Annual surveys of occupation-related injuries, illnesses and fatalities of workers in agriculture regularly indicate agricultural occupations are among the most stressful and hazardous. Acculturative stress and separation from family or family conflict put farm workers at even greater risk of mental health problems. Farm workers may be more likely to experience anxiety than workers in other occupations. They often work without adequate sleep and hurry to undertake field work, particularly during planting and harvesting seasons.

The core GAD symptom is chronic, excessive and uncontrolled worry. GAD is frequently associated with other psychiatric disorders. The effects of GAD on health-related quality of life have been reported to be even greater than observed in major depressive disorder, which is known to be disabling and costly. One scale that has been developed and validated for early detection or screening of probable GAD cases with excellent psychometric properties is the GAD-2, which we propose to use in the NAWS. It is easy to administer and its shortness allows it to be used in epidemiologic studies and also in remote health surveys along with other health questionnaires. The scale has been culturally adapted and is available in Spanish. The 2-item generalized anxiety disorder scale (GAD-2) can be scored between 0 (never) and 6 (almost every day). The overall score can range between 0 and 6 and can be used to assign farm workers to the following severity levels (0-2) minimal, and severe (3-6). Using a cut-off value of ≥ 3 , a sensitivity =0.86, specificity =0.83, and Cronbach's $\alpha=0.927$ have been reported.

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 NAWS is a multi-agency funded effort and designing the questionnaire is a collaborative undertaking, involving several federal agencies that directly use the results. In addition to ETA, these have included the EPA, ED, and several institutes and administrations within HHS. Representatives of these and other agencies regularly meet to discuss program-specific uses of NAWS data.

The proposed questions on education and training programs will be very useful to NFJP and a range of federal agencies for planning education and training program delivery to MSFWs and their dependents. In particular, the data will permit ETA and NFJP to measure the extent to which farm workers participate in adult education programs, including an assessment of whether the individual completed the program. Furthermore, the data will inform analyses to measure the effects of participating in NFJP-funded programs. In this proposed analysis, researchers will apply propensity score matching using NAWS respondents who are NFJP-eligible but who have not participated in any kind of training as the comparison group to measure the impact of adult education and training on income, agricultural employment and complementary employment outside of agriculture.

Cross-agency programs will also benefit from using this information. Researchers in a wide variety of fields will utilize data about participation, duration and education attainment in the NAWS population in support of a range of topics including farm worker employment stability, both in agriculture and complementary occupations, income and earnings, and utilization of federally-funded education programs among MSFWs and their dependents.

The information on digital literacy will be very useful to a range of federal and state agencies for planning service delivery to MSFWs and their families. Efficient delivery and coordination of services increasingly depend on broad consumer access to and use of

information technologies in such domains as safety, health care, education and training, social services and employment. Cross-agency initiatives and programs will also benefit from using this information about MSFWs. Researchers in a wide variety of fields will utilize data about technology access and use in the NAWS population in support of a range of topics including farm worker safety and health issues, education, training and employment issues, and utilization of various services by the farm worker population.

The information on digital literacy will be used in a variety of ways. Agencies and researchers will use the data to depict technology access and utilization in the target population, and compare it with other populations of interest in terms of location, economic and educational background. More in-depth studies will explore the intersection of technology and digital literacy with other data within the NAWS, cross tabulating the supplemental information with health and health care indicators, region/crop-specific training and safety information, and so forth. The information could also be useful for planning in-depth assessments of digital literacy skills in future NAWS cycles. Such assessments will be quite feasible given the new assessment tools being made available through PIAAC. Such a future assessment, made possible by the supplemental information collected in this cycle, could support the design and implementation of effective digital literacy training for using broadband internet technologies in a range of domains such as health care, safety and education.

Information on quality and access to health care among farm workers, their spouses, and children will be very useful for HRSA to undertake outreach focused on expanding farm worker access to comprehensive, affordable, and culturally and linguistically effective health services. An expansion in access to health has implications for health care utilization as previous research shows that having health insurance makes medical care more affordable and accessible.

The information on quality and access to health care may be used in several ways. The information will assist HRSA with the development of a more robust, data-based response for addressing stakeholder concerns about the lack of health insurance among migrant children and the quality of health care these children receive. The information on health access for children and spouses can improve HRSA's ability to remove barriers to accessing care, as well as improve the quality of care received. Key stakeholders focused on health access and the quality of health for migrant children and their families have repeatedly commented on the lack of health insurance for migrant children and their families. HRSA, stakeholder advocates and researchers can use the data to describe and study health insurance coverage and access to medical care for migrant children and their families, and to make recommendations regarding health care screening and delivery. In addition, this information can be examined along with other information collected in the NAWS to identify specific risk factors, such as children in mixed status families, which may need to be targeted for intervention/prevention efforts. Having more specific information on health insurance, preventive care and access to medical services, and especially making available national prevalence data, will provide important bench marking data that will allow for regional and

other comparisons. These data also have the potential to identify groups experiencing barriers to health care access and for whom expansion of access to quality care is needed.

The information on GAD among farm workers will be very useful to a range of federal, state, and local agencies involved in occupational health and to community and migrant health centers in particular. Rural health care providers are likely to confront problems of poor mental health among farm workers. Research has shown that GAD affects mental health functioning and health-related quality of life. There is also some evidence of an association between poor mental health and increased risk of occupational injury. This impact will be felt, not only for the farm worker, but the family as well. Those agencies or services dealing with children of these farm workers will also find this information useful. Outreach focused on protecting farm worker mental health has implications not only for mental health service delivery, but also for health care utilization in general as previous research has found that poor mental health is associated with increased levels of health care utilization.

The information gathered on GAD may be used in several ways. Researchers in multiple disciplines (e.g., occupational health, psychology, sociology, anthropology, and medicine) can use the data to describe and study the occupational health of this vulnerable population, and make recommendations regarding health care screening and delivery. In addition, this information can be examined along with other information collected in the NAWS to identify specific risk factors for poor mental health that should be targeted for intervention/prevention efforts. Having more specific information on the mental and physical health of these workers, especially making available national prevalence data, will provide important benchmarking data that will allow for regional and other smaller group comparisons, providing the potential to identify and intervene in groups experiencing elevated risks.

Current and previous collections of NAWS data have been widely used. Examples include:

- Since 1999, ETA has used NAWS data in its formula for allocating farm worker employment and job training funds across states under Section 167 of the Workforce Investment Act.
- In January 2015, the Legal Services Corporation (LSC), a quasi-governmental agency, utilized NAWS data in a new formula for estimating the number and geographic distribution of agricultural workers who are eligible for LSC-funded legal services.
- ED's Office of Migrant Education periodically utilizes NAWS findings to better understand the needs and characteristics of the population served in its various programs.
- Since 2008, the Administration for Children and Families (ACF) has been using NAWS data to meet a congressional mandate to collect data on the barriers that farm workers

face participating in the Migrant and Seasonal Head Start (MSHS) program. ACF also uses the data to estimate the number and distribution of the MSHS-eligible population.

- EPA has used NAWS data to determine the languages in which Worker Protection Standards pesticide safety instructions should be provided. In addition, data on the number of days per month that workers are exposed to pesticides has informed exposure models, and data on the number of days worked in various crops is being assessed for use in cancer risk assessment models. Preliminary data on the number of hours per day farm workers are potentially exposed to pesticides, from the 2013-2014 EPA questions, is undergoing initial analysis.
- In preparation for both the 2000 and the 2010 Decennial Censuses, The Bureau of the Census used NAWS findings on farm worker household characteristics and living arrangements to inform its approach to locating and administering the Census questionnaire to MSFWs, a historically undercounted population.
- The United States Department of Agriculture's (USDA) Economic Research Service has been using NAWS data on demographic and employment characteristics to quantity- and quality- adjust the number of farm workers in its agricultural productivity models.
- The Bureau of Economic Analysis has been using NAWS data in its international transactions account estimates, which are part of Gross Domestic Product.
- The Congressional Budget Office (CBO) has used NAWS data to estimate the economic impacts of immigration legislation. In FY 2013, the CBO used NAWS data to score S.744, "The Border Security, Economic Opportunity, and Immigration Modernization Act." NAWS data made it possible to estimate of the number of farm workers that would qualify for earned legalization and the numbers and locations of their spouses and children. Similarly, NAWS data assisted the CBO in scoring H.R. 1773 "The Agricultural Guestworker Act" by providing estimates of the number of unauthorized crop workers that would qualify for an H-2C visa and simultaneously be eligible for adjustment of status under the Deferred Action for Childhood Arrivals executive order.
- The NAWS was similarly useful in FY 2006 for assessing immigration legislation. CBO relied on NAWS data to estimate the number of unauthorized farm workers who would qualify for legalization under Section 613 (a) "The Blue Card Program" of Senate Amendment 3192 to the "Securing America's Border Act" (S.2454). CBO used the resulting findings and other NAWS data to project the costs of the legislation. Similarly,

the Congressional Research Service used NAWS data in FY 2006 to estimate the share of newly legalized farm workers who would leave the farm labor market upon obtaining legal status.

- In FY 2004, HHS utilized NAWS health insurance data to fulfill its obligations under Section 404 of Public Law 107-251, “The Health Care Safety Net Amendments of 2002.” Section 404 required DHHS to report to Congress on the problems experienced by migrant and seasonal farm workers in obtaining health services from the State-administered Medicaid and State Child Health Insurance Programs. In FY 2002, HHS, Bureau of Primary Health Care used NAWS findings to construct MSFW enumeration profiles for ten states.
 - While U.S. federal government agencies primarily use NAWS data for programmatic purposes, they also use the survey’s data to exemplify the U.S. government’s fulfillment of responsibilities under international agreements. In FY 2000, the Department of State utilized NAWS findings at the Best Practices for Migrant Workers conference, which was held in preparation for the spring 2001 Summit of Americas. DOL’s Bureau of International Labor Affairs has used NAWS findings at each of the last four U.S.-hosted government-to-government meetings with Mexico regarding the labor rights of Mexican migrant farm workers. These meetings are part of the dispute resolution process under the North American Agreement on Labor Cooperation (NAALC), the labor side-bar agreement to the North American Free Trade Agreement. In 2002, the Commission for Labor Cooperation, which was established under the NAALC, made extensive use of NAWS data in its report “Legal Background Paper on Migrants in North America.”
 - Several Presidential Commissions have used NAWS findings for program evaluation purposes. These include the Commission on Migrant Education, the Commission on Agricultural Workers, and the Commission on Immigration Reform. Moreover, the NAWS provides timely information to Congress on agricultural labor and child labor issues. The Government Accountability Office has utilized NAWS data in its reports to Congress about information gaps on the immigrant population and DOL made extensive use of NAWS findings in its December 2000 report to Congress “The Agricultural Labor Market - Status and Recommendations.”
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.**

The use of information technology to reduce respondent burden is currently inappropriate for this survey due to the very low literacy levels among farm workers. All interviews are conducted in-person and the interviewer writes down respondent answers directly on the questionnaire. The proposed questions will be inserted into the primary questionnaire.

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.

There are no reliable national estimates of the employment, demographic, and health characteristics of hired crop workers that would render the NAWS duplicative. Moreover, there are no existing data sources that would provide reliable estimates of the quality and access to health care, access to digital information sources, and participation in education and training of farm workers. The primary NAWS questionnaire has collected information on health care access, and includes some questions on participation in education and training.

Prior to the NAWS, information on farm workers was collected via a supplement to the Current Population Survey (CPS). The CPS, however, excludes large numbers of employed crop workers from its sample, particularly the foreign-born and migrant workers. Many of these workers are difficult to find because they do not live at recognized addresses for long periods of time. USDA's Farm Labor Survey (FLS) was also considered. The FLS collects wage and other employment data at the national and regional level. It is conducted with employers and personnel managers, however, and cannot be used to describe the characteristics of hired crop workers.

In addition to considering other surveys, DOL also investigated the possibility of using existing data sets to evaluate the characteristics of workers in U.S. crop agriculture. Unfortunately, data recorded by social security numbers in the Unemployment Insurance (ES 202) files, as well as files of the Social Security Administration, do not provide the appropriate employment, demographic, and health characteristics. DOL determined that only a survey that was both personally administered and establishment-based (workers are sampled at their place of employment) would be appropriate for describing the population of hired crop workers. The NAWS is the only survey that satisfies these requirements.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Agricultural employers of all sizes are selected in the NAWS by simple random sampling. It is necessary to sample employers first as there are no universe lists of farm workers. The farm worker sampling frame at each establishment is constructed with the help of the employer, packinghouse manager, personnel manager, farm labor contractor, or crew leader, as appropriate. In each case, the 'employer' serves as a voluntary contact point for the purpose of creating the worker frame.

To reduce burden on both agricultural employers and farm workers, a stratified sample is used to represent the national population of farm workers. The NAWS contractor minimizes the burden of this activity on all employers, including small employers, by trying to determine if the employer is still in business before contacting the business and by notifying the employer ahead of time by mail that they have been selected to participate. To further minimize burden, farm workers are interviewed, whenever possible, outside the workplace, and during a break period, lunch, or before or after the workday. In all cases, interviewers are instructed, and employers are informed ahead of time, that the interview process is not to interfere with the employer's production activities.

This information collection does not have 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.

The NAWS is conducted yearly in three cycles to ensure sensitivity to seasonal fluctuations in labor across the country. Staggered sampling cannot be avoided due to the seasonality of crop employment. A representative random sample of employed farm workers can only be obtained by conducting interviews at various times in the year. The seasonality of crop employment and the mobility of workers require seasonal sampling in order to avoid bias.

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.

This information collection is consistent with 5 CFR 1320.5.

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.

As required by the Paperwork Reduction Act of 1995 (44 USC. 3506(c)(2)(A)), ETA published a notice in the Federal Register on 06/26/2015 (80 FR 36853), seeking public comment on the proposed changes. ETA received four sets of comments (letters) in response to this notice. Each letter expressed support for the continuation of the NAWS. In one letter, the commenter asked that it be notified if changes to the questionnaire will impact its ability to generate estimates of the number of international migrant farm workers and their incomes, which are needed to annually update international transaction accounts and gross domestic product. ETA assures that none of the proposed changes will affect this commenter's ability to produce these economic figures.

Three of the letters offered suggestions for: retaining and/or modifying existing questions; adding new questions; and modifying questions that ETA has proposed. As a result of these comments we will make the following questionnaire changes:

- Add a subquestion about the availability of cellphone texting feature to the Digital Information section;
- Remove the response category “Smartphone” from the Digital Information section;
- Add a question about taking GED classes to the Education and Training section;
- Retain questions A16, D2, D3, and D29;
- Retain and modify response categories in question G4;
- Separate injury and illness in questions HA1 and HA15;
- Ask question HA18 (sought health care) for injury and illness;
- Separate “No insurance/ Too expensive” in response category “e”, question HA8;
- Modify question D65 to distinguish if respondent lives in a labor camp or a migrant center.

With these changes, it is anticipated that the estimated additional burden per farm worker respondent will increase by less than one minute. As such, no changes were made to the estimated burden hours (see Table 2) following the review of public comments.

In Table 1, below, the summarized comments and ETA’s responses are grouped by the following categories: Digital Information, Education and Training, Existing Questions, Health, Housing, and New Questions (received in public comments).

Table 1. Summary of Public Comments and ETA’s Response

Digital Information	ETA’s Response
<p>There were two suggestions for asking respondents where they access digital information, for example at home, a public library, or other place.</p>	<p>The proposed questionnaire already asks where information sources are used, if the respondent answers that he/she uses a computer and/ or a tablet.</p>
<p>It was suggested that the first question concerning access to digital information sources be rephrased and broken up so that it will be clearer to respondents and “more specific about internet use, text messaging, apps, and other ways people communicate using a computer or mobile phone.” Specifically, it was suggested that the question could be rephrased as:</p>	<p>The first question worked well during testing.</p>
<p>Do you or any member of your family use</p>	<p>As some respondents have access to but do</p>

<p>the internet? If YES, then how do you access the internet?</p> <ol style="list-style-type: none"> Computer Cell phone Tablet Other [Specify] <p>and followed by:</p> <p>How else do you receive and send information on your cell phone?</p> <ol style="list-style-type: none"> Voice calls Text messaging Facebook Other apps [Specify] Other [Specify] <p>One commenter also suggested that questions about barriers or limitations to access be asked.</p> <hr/> <p>Lastly, it was suggested that the category “Smartphone” be deleted from the list of possible responses to the question about types of devices used.</p>	<p>not use digital information sources, it is necessary to first ask about access and then inquire about use. For the time being, ETA will administer these questions as currently written.</p> <p>We will ask respondents if they have texting capability with their cell phone, and will consider the proposed detailed questions about cell phone use in a future information collection.</p> <p>ETA will consider adding questions about barriers and limitations questions in a future information collection.</p> <hr/> <p>“Smartphone” will be deleted as a response category.</p>
<p>Education and Training</p> <p>There were five comments on this proposed series of questions.</p> <hr/> <p>Three comments concerned response codes to proposed questions 4, 8, 11, and 12, which ask about completion of training, having considered attending training, why training was not attended, and special training classes for farm workers, respectively. In two instances, the commenter suggested that additional response codes be added, and in one instance the commenter suggested that response codes be modified.</p>	<p>ETA’s Response</p> <hr/> <p>NAWS response categories are developed through testing and reflect common responses. When respondents’ answers do not match existing categories, the interviewer writes down the response on the questionnaire or in a provided text field. Non-standard responses are routinely assessed to determine if response categories need to be modified or augmented. In these questions (4, 8, 11, and 12), the responses are not read to the respondent. Rather, the interviewer enters all the codes or marks all the responses that correspond to the respondent’s answers.</p>

<p>It was suggested that, for the question about worker safety training, it is irrelevant to ask if the training was completed. Instead, it would be useful to know if the respondent understood the training, and if not, why not.</p> <hr/> <p>One commenter suggested adding a question about graduate equivalency diploma (GED) classes that would be tabulated separately from English as a Second Language (ESL) or “basic skills” classes.</p> <p>Finally, it was suggested that “information” may be a more suitable term for these questions than “training” as some studies have shown that farm workers who received “training” reported not receiving it because their understanding of the word training implies specific directions on how to use a particular type of equipment or handle a particular type of material.</p>	<hr/> <p>ETA agrees that training comprehension, especially comprehension of safety training, is important to assess and will consider this question domain for a future information collection. It may be necessary to pilot questions about comprehension. As there are several types of safety training, e.g., heat stress, pesticides, injuries, it is likely that a questionnaire grid would be needed.</p> <hr/> <p>ETA will make this change to the proposed education and training grid by entering a separate row for GED between row D (ESL) and row E (basic skills).</p> <hr/> <p>This is an important observation. Although this issue has not come up in the many years of administering NAWS pesticide training questions, it will be discussed at the next NAWS interviewer training session and a determination will be made about adding dialogue regarding what is meant by “training” when training questions are administered.</p>
<p>Existing Questions</p> <p>It was suggested that 14 of the 75 questions that ETA has proposed discontinuing or replacing be retained. In addition, ETA received recommendations to modify seven questions and relocate seven questions. Questions that were recommended to be retained, modified, or relocated are listed below.</p> <p>Recommended to be retained (14): A16, B3, B4, D2, D3, D20, D21, D28, D29, D39a, E1, EP5, EP6, and EP7.</p>	<p>ETA’s Response</p> <p>ETA appreciates the feedback it received on proposed changes to the questionnaire. The questions that will be retained, modified, or relocated are briefly annotated here.</p> <p>Questions A16, D2, D3, and D29 will be retained. The others will be discontinued and considered for the future on a rotating basis.</p>

<p>Recommended to be modified (7): A7, B2, B10, D7, D34a, D35, G4.</p> <p>Recommended to be relocated (7): B7, B8, B20, B21, B22, B23, B24.</p> <p>These questions ask about language and it was suggested that they be moved to the beginning of the questionnaire so that the interviewer will quickly establish the dominant language of the respondent and use that language for the interview.</p>	<p>The G4 response category “disaster assistance” will be retained. In addition, the G4 “legal services” response will be changed to “legal advice or services”. The other suggested modifications will not be implemented.</p> <p>This is an interesting observation about the questionnaire. Interviewers, however, quickly ascertain the best language for the interview moments after the respondent is selected (randomly, by lottery, or by census). These questions, like all NAWS questions, are strategically placed to meet several objectives, including interview flow and optimization of questionnaire domains.</p>
<p>Health</p> <p>There were eight types of comments about the proposed health questions.</p> <p>Two commenters suggested separating illness and injury in proposed questions HA15 (family members) and HA1 (respondent) which ask about reasons for using health care services in the last year.</p> <hr/> <p>Three commenters suggested adding a sub-question to HA1 and HA15 to inquire if family members and the respondent used any type of health care service for behavioral health concerns, such as depression, alcoholism, and intimate partner violence, and one commenter suggesting adding a response category for using mental health counseling to HA15. In addition, one commenter suggested asking the respondent, in HA15, if he/she sought health care in the last year for pesticide exposure and workplace assault.</p>	<p>ETA’s Response</p> <p>ETA agrees with this suggestion and will make the change in both HA15 and HA1.</p> <hr/> <p>These are important health domains and ETA will discuss them with its NAWS Federal partners. At this time, however, it will not be possible to add these domains to the NAWS. Several of these domains might require cognitive and pilot testing.</p>

<p>Two commenters suggested that the questions on quality of and access to health care (HA1 – HA9) be administered to family members as well as to the respondent, and that they replace questions HA15-HA18, which are administered to spouses and children under the age of 22. In addition, one commenter asked why questions HA15-HA18 will only be administered to children who are under the age of 22, and why not under the age of 26.</p>	<p>Asking respondents to answer the HA1-HA9 questions about all family members would be burdensome to both the respondent and the interviewer and could impact data quality. At this time, the health information about family members that will be collected in questions HA15-HA18 will meet the information needs of the sponsoring NAWS Federal partner. At this time, only health information on spouses and children who are under the age of 22 will be collected.</p>
<p>Two commenters suggested that respondents be asked why their family members didn't use health care services in the last year for an illness or an injury (HA18), in each case where the respondent informs that a family member did not use health care for an illness or injury.</p>	<p>ETA will make this change.</p>
<p>Two commenters expressed concerns about the validity of the General Anxiety Disorder (GAD)-7 scale for Spanish speaking and indigenous farm workers in the United States, because the GAD-7 was validated with urban populations in Spain.</p> <p>In addition, one commenter expressed concern about the phrasing “Feeling nervous, anxious or on edge” in the first GAD-7 question, noting that there has been some academic research on the meaning and the use of the work “nervios” in farmworker communities” and that the question “could ask simply if the respondent has felt nervios rather than adding the words “anxious” or “on edge”, which are encompassed in the term nervios.”</p>	<p>This feedback on the GAD-7 is appreciated. In addition to being validated in Spain, the GAD-7 was used in a study in which participants were predominantly Mexican American and were drawn from a single 5,000 square mile, border county. This study evaluated the reliability, structural validity, and convergent validity of the English and Spanish language versions of the GAD-7 for Hispanic Americans in the United States. A community sample of 436 Hispanic Americans with an English (n = 210) or Spanish (n = 226) language preference completed the GAD-7. The findings suggested that scores on the English and Spanish versions of the GAD-7 are reliable and structurally valid for use with Hispanic Americans.</p> <p>“In sum, the present study provides evidence supporting the GAD-7 as a good assessment</p>

	<p>option for researchers, clinicians, and other health professionals who want a reliable and valid screening tool for GAD in English or Spanish for use with Hispanic Americans. The unidimensional GAD-7 can be reliably and validly used among Hispanic Americans with an English or Spanish language preference.” (page 468 of referenced article, see below).</p> <p>While the sample is not hired immigrant farm workers, the participants were primarily Mexican Americans from a border county suggesting that the instrument can be used with Hispanics in the United States.</p> <p>Reference: Mills SD, Fox RS, Malcarne VL, Roesch SC, Champgagne BR, Sadler GR. The psychometric properties of the Generalized Anxiety Disorder-7 scale in Hispanic Americans with English or Spanish Language preference. <i>Cultural Diversity Ethnic Minority Psychology</i> 2014 July; 20(3):463-468. doi:10.1037/a0036523</p>
<hr/> <p>There were three types of comments about response categories in various health questions.</p> <p>Two commenters suggesting adding new response categories to questions concerning the type of health care provider. One commenter suggested adding the response category “curandero” (traditional healer) to questions HA2 and HA16, and one commenter suggested adding the response category “Community Health Worker” to question HA16.</p> <hr/> <p>Two commenters suggested separating “Too</p>	<hr/> <p>NAWS response categories are developed through testing and reflect common responses. When respondents’ answers do not match existing categories, the interviewer writes down the response on the questionnaire or in a provided text field. Non-standard responses are routinely assessed to determine if response categories need to be modified or augmented.</p> <hr/> <p>ETA will make this change.</p>

<p>expensive / No insurance” in question HA8, response category “e”, noting that often times farm workers have insurance but they are unable to use it due to large deductibles and co-pays.</p> <hr/> <p>Three commenters expressed concern that the interviewer (or the respondent) will not be able to distinguish between health care services sought at a “community health center” from those sought at a “migrant health clinic”, both of which are response categories to a number of questions about health services. The suggestion is that, to avoid confusion and errors, interviewers should simply code for “community health center.”</p>	<hr/> <p>These response categories will remain separate in the various health questions, but they will typically be combined when data are tabulated and reported. These response categories were joined previously, but NAWS Federal partners asked ETA to separate them to meet information reporting needs.</p>
<p>Housing</p> <p>Three commenters suggested that the proposed new question on housing (D65), in which respondents would be asked if they live in a labor camp or Migrant Center, was confusing and that the question could be rephrased as “Do you live in a labor camp run by your employer or labor contractor, or a Migrant Center run by a public agency?”. The proposed responses for this modified question would be “employer labor camp”, “FLC labor camp”, or “Migrant Center”.</p>	<p>ETA’s Response</p> <p>The intention was to combine information from this question with information from question D35 to determine if the respondent lived in an employer labor camp or a migrant center. However, ETA agrees with the suggestion and will make this change, as it will facilitate data analysis and reporting, especially for users of the NAWS public data file.</p>
<p>Proposed New Questions</p> <p>Collectively, three commenters proposed ten new questions. Of these, six concerned farm labor supply, and four concerned health issues.</p> <p>Proposed farm labor supply questions:</p> <p>One commenter suggested that a special supplement on immigration status of farm worker families that focuses on administrative relief be added because this kind of information has important</p>	<p>ETA’s Response</p> <p>The NAWS began in 1988 to answer questions about farm labor supply and the proposed questions are interesting domains to consider. ETA will discuss these domains with NAWS Federal partners and will</p>

<p>implications for farm labor supply. The first three questions of the proposed supplement would ask about awareness of the Deferred Action Program for Childhood Arrivals (DACA), whether the respondent or any family members had applied or planned to apply for DACA, and barriers to applying. The last three questions would address family-sponsorship visas and the status of family petitions.</p> <hr/> <p>Proposed health questions:</p> <p>1) Are towels available for drying washed hands? This question would be added to the current section on workplace hygiene</p> <p>2) Was there follow up treatment for an abnormal pap smear result? This question would be added after question NH6 (for women only): “Have you ever had a PAP SMEAR TEST?”</p> <p>3) Did the respondent seek and/or receive treatment for stress and anxiety, for example advice, counseling, and medication? This would be a follow up question to GAD-7).</p> <p>4) Did the respondent ever have an injury at work?</p> <p>Regarding the latter, one commenter strongly recommended that at least one question about workplace injuries be added, noting that it found it problematic that there is no injury question in the individual health history section (NH1- NH6).</p>	<p>consider them for a future information collection. The current questionnaire is already designed to capture if farm workers obtained a work authorization status through DACA.</p> <hr/> <p>ETA will discuss these proposed questions (1, 2, and 3) with NAWS Federal partners to determine if they or similar questions should be proposed for a future information collection.</p> <p>ETA will discuss this proposed question with NAWS Federal partners. Previous occupational injury surveillance in the NAWS has included a series of questions to determine if reported injuries meet qualifying criteria. It is likely that future questions about workplace injuries would also include the qualifying/screening questions. At this time, it is not possible to add injury questions to the NAWS.</p>
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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.

DOL consults with many outside agencies regarding the availability of information on the demographic, employment, and health characteristics of farm workers, including the Departments of Agriculture, Health and Human Services, Homeland Security, and Education, the Bureau of the Census, the Bureau of Economic Analysis, and the EPA. These departments and agencies support the NAWS as a means of complementing other data available to them. Indirect but useful data about farm workers are available from USDA, which conducts the Census of Agriculture and the FLS. None of the USDA or FLS data, however, overlap with NAWS data.

In the last year, ETA has also consulted with NIOSH, health experts at NIOSH-funded agricultural health and safety centers, HRSA, and HRSA and ETA grantees about the NAWS questionnaire and the survey's findings. In addition, ETA and the NAWS contractor have presented survey findings and overviews of proposed questionnaire changes to the entities from whom the information is collected. Various presentations were made with agricultural employer and farm labor contractor associations, as well at events where farm workers and farm worker advocates were present. Valuable feedback on the NAWS was provided from stakeholders at these presentations.

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

Farm workers will be compensated \$20 for their time responding to the survey to offset the inconvenience and any expense incurred to participate (e.g., child care). NAWS interviewers provide the incentive just prior to the start of the interview. There will be no additional incentive payment to respondents for answering the proposed new questions. Research indicates that incentives increase response rates in social research (Ryu, Cooper, & Marans, 2006). According to the National Science Foundation, monetary incentives improve study participation and offset the costs of follow-up and recruitment of non-respondents (Zhang, 2010). Incentives are not expected to exceed \$67,380 (3,369 responses x \$20).

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

The survey collects information on wages and working conditions, legal status, occupational health, and recruitment practices. The workers are informed that their information will be kept private to the extent possible under the law to help them overcome any resistance to discussing these issues. The workers are also informed of the purposes of the information collection as well as the safeguards to protect their privacy.

Respondents are also informed of the limitations concerning the privacy assurance. Specifically, they are informed that: 1) under written agreement with federal research agencies, ETA may release certain information necessary for research after all identifying information has been removed; and 2) unless required by law, or necessary for litigation or legal proceedings and except as indicated in the privacy statement, ETA will hold all personal identifiers (e.g. name and address) in total confidence and will not release them. Interviewers are sworn to protect the privacy of both agricultural employers and farm worker respondents. To protect the identity of agricultural employers, only the direct-hire employees of the contractor who have been made agents of the Bureau of Labor Statistics and who have sworn to abide by the privacy safeguards may have access to the names and addresses of employers and may only use this information for the purpose of locating hired crop workers. Workers are interviewed alone to protect their privacy. Additionally, farm worker respondents will be protected by ETA's System of Records for the NAWS, which was established under the Privacy Act (5 USC 552a). At the conclusion of the survey, all records of the names and addresses will be destroyed.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

Of the proposed questions, those on health are likely to be the most sensitive. Based on responses to similar questions in previous administrations of the survey, however, it is evident that the privacy assurances, as well as the rapport that develops between the interviewer and respondent, make them less intrusive. Federal agencies with mandates concerning the health status of farm workers need the additional information that will be made available by the new health questions to plan, implement and evaluate their programs effectively. Farm workers respond well to all the health questions and the data obtained is of high quality. Information will be analyzed in aggregate form and individual health histories will not be available to researchers. The privacy of the respondents will be guaranteed.

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

Burden hour calculations are shown below. On average, it will take 60 minutes to administer this questionnaire. This estimate is based on: 1) the contractor's experience estimating burden changes during its 26 years administering the NAWS; 2) mock interviews with contractor staff, including interviewers; and 3) pilot testing in three parts of the country with farm workers who were gathered for focus group (cognitive) testing of the questionnaire.

The estimated average time is comparable to the average time required in previous administrations of the NAWS after accounting for differences in questionnaire content.

While all respondents will answer the primary questions, only those who have children under the age of six will answer the seven ACF-sponsored questions on child care services. Based on recent administrations of the questionnaire, it is estimated that approximately 20 percent of the 3,369 respondents will have children under the age of six.

Taking into consideration all family types, the average time per worker respondent is 60 minutes. Assuming a farm worker's time is worth \$11.34 per hour <http://usda.mannlib.cornell.edu/usda/current/FarmLabo/FarmLabo-05-21-2015.pdf> and the total farm worker burden hours are 3,436, the total cost is \$38,964 of worker time.

In addition, as an establishment survey, employers are contacted to gain permission to sample their workers. In FY 2014, 2,823 workers were interviewed on 583 farms, or about 4.8 workers per farm. A total of 3,149 farms were contacted and 1,207 of them were determined to be eligible for participation, meaning that farm workers were employed there when interviewers arrived to speak with the employer, for a farm eligibility rate of 38 percent ($1,207/3,149 = 38\%$). Interviews were conducted at 583 of the eligible farms, for a response rate of 48 percent ($583/1,207 = 48\%$). Assuming the establishment eligibility rate and response rate will be at least 38 percent and 48 percent, respectively, then approximately 3,847 establishments will need to be approached and invited to participate in order to interview 3,369 farm workers on approximately 702 farms in FY 2016 (target sample size \div interviews per farm \div eligibility rate \div response rate = total establishments to contact):

$$3,369 \text{ interviews} \div 4.8 \text{ interviews per farm} \div .38 \div .48 = 3,847 \text{ establishments to contact}$$

The discussion with ineligible employers lasts, on average, five minutes, while the discussion with eligible employers can be from ten to 14 minutes, depending on the number of questions the eligible employer has about the survey. The average discussion time with eligible employers is approximately 12 minutes. Assuming an agricultural employer's time is worth \$34.89 per hour <http://www.bls.gov/oes/current/oes119013.htm> and the number of burden hours is 491, the total cost is \$17,131 of employer time.

Table 2. Estimated Burden Hours Associated with the FY 2016 NAWS

Who will be interviewed/contacted?	Survey Instrument	Respondents per Year	Average Time per Respondent	Total Hours
Farm Workers	Primary Questionnaire, with proposed changes	3,369	60 minutes	3,369
Farm Workers with children under age six	Child Care Questions*	674*	6 minutes	67
Ineligible Employers	Point of Contact Only	2,385	5 minutes	199
Eligible Employers	Point of Contact Only	1,462	12 minutes	292
Total		7,216		3,927

* Not included in total respondents; they are a subset of the Primary Questionnaire respondents.

Source: These estimates are based on previous administrations of the NAWS. Survey background information is available at: <http://www.doleta.gov/agworker/naws.cfm>

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

ETA associates no burden with this information collection beyond the value of respondents' time.

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 estimated total survey cost for FY 2016 is \$5,351,374. This includes the cost of the contract and ETA employee time (\$122,350). The contract costs include sampling, questionnaire design and testing, data collection, and report and public data set preparation.

Table 3. Estimated Total Survey Costs for FY 2016

Category	Hours	Cost
Sampling	4,506	\$516,411
Questionnaire Design and Testing	1,112	\$164,741
Data Collection and Data Set Preparation	51,926	\$3,907,119
Reports and Analyses	6,508	\$640,753
ETA Employee Time	1,878	\$122,350
Total	65,930	\$5,351,374

Source: Contract costs are based on internal ETA contract budget files.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

There will be an increase of 528 burden hours (see Table 4 below), most of which is associated with changes to farm worker and employer sample size. The increase of 369 farm worker respondents, which results in an increase of 369 hours, is necessary for reporting point estimates on key demographic and employment characteristics at the desired level of precision, taking into account the survey's statistical design.

With the overall increase in farm worker respondents, it is estimated that 74 additional farm worker parents will answer the questions on child care, resulting in an increase of 7 hours. Although the proposed questions on education and training, digital literacy, labor camp residence, GAD, health history, and quality and access to health care will require an additional nine minutes per respondent, this burden will be offset by the same amount with the deletion of the EPA seven-item supplement, the deletion of 17 other questions from the primary questionnaire, and the stem and/or response category modifications to six questions.

Although there is an increase of 524 eligible employers (from 938 to 1,462), there is an associated decrease of 21 burden hours. The decrease obtains because NAWS interviewers have become more efficient explaining the purpose of the survey and responding to employer's questions, and now spend approximately 12 minutes, on average, with eligible employers, rather than 20 minutes. There is an increase of 199 hours associated with contacts with ineligible employers. The burden hours associated with this group were not previously estimated.

With the temporary discontinuation of the NIOSH-sponsored injury and musculoskeletal questions, which will result in a decrease of 26 hours, there will be a net addition of 528 burden hours.

Table 4. Change in Burden Hours Associated with the FY 2016 NAWS

Respondent Type	Respondents per Year		Average Time per Respondent (minutes)		Total Hours		Change (Hours) FY 2016
	Previous	New	Previous	New	Previous	New	
Farm Workers	3,000	3,369	60	60	3,000	3,369	+ 369
Farm Worker Parents with Children Less than Six Years old	600*	674*	6	6	60	67	+7
Farm Workers with a Qualifying Injury	106*	0*	10	0	18	0	- 18
Farm Workers with a Musculoskeletal Problem	480*	0*	1	0	8	0	- 8
Ineligible Employers	Not Estimated	2,385	0	5	0	199	+ 199
Eligible Employers	938	1,462	20	12	313	292	- 21
Total	3,938	7,216			3,399	3,927	+ 528

* Not included in total respondents; they are a subset of the Primary Questionnaire respondents.

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.

The most recent dissemination of NAWS data was the July 2014 release of the 1989-2012 public access data file, which replaced the 1989-2009 file. The July 2014 release included a set of 22 tables, charts, and text summaries, including results for all of the NAWS health data from 1999-2010, grouped by two-year intervals. A restricted use data set is also available to researchers needing information not in the public access data. Additional findings, including regional summaries of data, have been presented at various stakeholder forums. Recent forums include the HRSA-sponsored Migrant Stream Forums, the Migrant Education and Identification and Recruitment conference, and the ETA-sponsored conference of Region 6 (West Coast) Monitor Advocates and NFJP grantees. The presentation slides from these forums are distributed to attendees and posted for other interested stakeholders and researchers. The NAWS contractor produces national level reports. The next report, which

will summarize data that was collected in fiscal years 2011-2012, is under review at ETA for publication later this year.

The proposed questions will be part of the FY 2016-2018 data collection and included in the national report that will be produced in FY 2018. The data will be added to the NAWS 1989-2018 public access data file. It is anticipated that researchers will use this data to compare to PIAAC data and other national and international data on broadband access. Health policy researchers will access either the public or restricted data to develop models explaining health behavior. HRSA and ETA will conduct additional analyses to meet the needs of their programs and grantees.

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 OMB Clearance Number and Expiration Date are published on the main NAWS questionnaire in the upper left-hand corner.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions” (5 CFR 1320.9).

This item is not applicable to this information collection because no exceptions are sought.

REFERENCES

Alves Pena, A. (2011). *The Effects of Continuing Education Participation on Agricultural Worker Outcomes*. Washington, DC: U.S. Department of Labor, Employment and Training Administration.

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