

**SUPPORTING STATEMENT FOR EXTENSION
OF OMB APPROVAL OF
THE FOOD SECURITY SUPPLEMENT
TO THE CURRENT POPULATION SURVEY
(OMB Control # 0536-0043)**

October 29, 2018

Submitted by:

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Economic Research Service
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Introduction

The Economic Research Service (ERS) of the U.S. Department of Agriculture (USDA) is requesting OMB clearance for ongoing fielding of the USDA Food Security Supplement to the Current Population Survey (CPS), which has been fielded annually since 1995. Food security, for the purpose of these reports, is conceptualized as access by all household members at all times to adequate food for an active, healthy life. Food insecurity is limited or uncertain availability of nutritionally adequate and safe foods or limited or uncertain ability to acquire acceptable foods in socially acceptable ways. Very low food security is a severe range of food insecurity in which eating patterns of one or more household members are disrupted and their food intake is reduced below levels they consider to be appropriate. The supplement was successfully fielded by the Census Bureau under the sponsorship of ERS from 1998-2017, and previously, under the sponsorship of the Food and Nutrition Service (FNS) from 1995-1997. The survey instrument is included as Attachment A. The content of the questionnaire is unchanged from the December 2017 collection.

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

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Supplement is sponsored by USDA as research and evaluation activity authorized under 7 U.S.C. 2204(a). This section outlines duties of the Secretary of Agriculture related to research and development including authorizing the collection of statistics. The Administrator of the Economic Research Service is authorized to conduct economic and social science research and analyses related to the U.S. food system and consumers under 7 CFR 2.67. The data to be collected will be used to address multiple programmatic and policy development needs of FNS and other Federal agencies. The US Census Bureau has the right to conduct the data collection on USDA's behalf under Title 13, Section 8(b).

One of USDA's strategic planning objectives is to "provide access to safe and nutritious food for low-income people while supporting a pathway to self-sufficiency" (objective 7.2). It accomplishes this objective, in part, by providing needy Americans access to a

more healthful diet through its food and nutrition assistance programs and comprehensive nutrition education efforts. USDA's 15 nutrition assistance programs, administered by the Food and Nutrition Service (FNS), account for over two-thirds of the Department's budget. "These programs form a nationwide safety net supporting low-income families and individuals in their efforts to escape food insecurity and hunger; achieve healthy, nutritious diets; and improve the well-being of families. Currently, the programs administered by USDA's Food and Nutrition Service (FNS) touch the lives of one in four Americans over the course of a year." Success of this objective will be measured in part by the annual food security statistics provided through this data collection (Source: *USDA Strategic Plan, FY 2018-2022*, <https://www.usda.gov/sites/default/files/documents/usda-strategic-plan-2018-2022.pdf>; see pages 56-57).

This monitoring need requires that USDA continues basic data collection, analysis, and evaluation. These data provide the basis for regular monitoring as well as ongoing development of scientifically-grounded methods for the consistent national measurement of food insecurity. These are essential elements of the explicit USDA responsibility under the Agricultural Act of 2014. Periodic collections of the CPS Food Security Supplement are fundamental in this monitoring and research effort.

ERS sponsors this data collection and conducts the monitoring and research work in partial fulfillment of its strategic plan mission to "anticipate economic and policy issues related to agriculture, food, the environment, and rural development, and conduct economic research that broadly and specifically informs public program and policy decisions." More specifically, these activities contribute to ERS Strategic Goal 4 which targets food insecurity: "Ensure that all of America's children have access to safe, nutritious, and balanced meals" (<https://www.ers.usda.gov/media/9361/strategic-plan-2013-18.pdf>).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The purpose of the CPS Food Security Supplement is to periodically obtain reliable data from a large, representative national sample as a basis for monitoring the prevalence of food security, food insecurity, and very low food security within the U.S. population as a whole and in selected population subgroups; conducting research on causes of food insecurity and the role of Federal food and nutrition programs in ameliorating food insecurity; and continuing development and improvement of methods for measuring these conditions.

Information will be collected on food spending, use of Federal and community food and nutrition assistance programs, difficulties in obtaining adequate food during the previous

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

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

ERS continues to conduct research on the food security measurement methods, including a 2017 ERS report titled *Examining an "Experimental" Food Security Status Classification Method for Households with Children* (<https://www.ers.usda.gov/publications/pub-details/?pubid=85213>). In this study ERS researchers examined an alternative method for classifying food insecurity in households with children but found the current method to be more consistent with indicators of food inadequacy. Research since the development of the food security measure have continued to show its strength and consistency across surveys and populations.

A full Spanish-language version of the Food Security Supplement was first included in the December 2014 Food Security Supplement upon receiving OMB's approval. Census continues to include the ERS translation of the Food Security Supplement in the computerized survey instrument (see Attachment G). ERS researchers assessed the effect of interview language on Hispanics versus non-Hispanics and found no differences in the statistical properties of the food security measure. These findings were published in a 2017 article in the *Journal of Economic and Social Measurement* (Volume 42, Issue 2, <https://content.iospress.com/articles/journal-of-economic-and-social-measurement/jem443?resultNumber=1&totalResults=91&start=0&q=Rabbitt&resultsPageSize=10&rows=10>).

USDA has analyzed the CPS Food Security Supplement data to provide statistical reports monitoring the extent and severity of food insecurity in the Nation's households annually since 1995. The most recent ERS report, *Household Food Security in the United States in 2017* (<https://www.ers.usda.gov/publications/pub-details/?pubid=90022>), based on the December 2017 survey, indicated that 88.2 percent of U.S. households were food secure throughout the entire year prior to the survey, while 11.8 percent were insecure at least some time during the year, including 4.5 percent with very low food security. Among households with children, 15.7 percent were food insecure, including 7.7 percent in which children, along with adults, were food insecure, and 0.7 percent in which children

experienced very low food security. The reports provide food security statistics at the national level, for critical subpopulations, and for geographical regions and States as well as statistics on food spending and use of Federal and community food assistance programs by food-insecure households.

Food security statistics based on these data are used by USDA to assess progress toward strategic plan objectives. For example, one of the outcomes measured for strategic goal 7 (“Provide all Americans access to a safe, nutritious, and secure food supply”) in USDA’s 2018-2022 strategic plan is “the annual measure of the proportion of households with ready and reliable access to the food they need”, i.e. annual food security statistics.

Food security statistics derived from the CPS Food Security Supplements are also the basis of two national objectives in the Department of Health and Human Services’ current Healthy People 2020 Initiative (<https://www.healthypeople.gov/2020/topics-objectives/topic/Nutrition-and-Weight-Status/objectives#4936>). Food security statistics are reported annually in *America’s Children: Key National Indicators of Well-Being*, a report by the Federal Interagency Forum on Child and Family Statistics (https://www.childstats.gov/pdf/ac2017/ac_17.pdf).

The data have been used to study factors affecting households’ food security. For example, a 2017 ERS research report, *The Effects of Energy Price Shocks on Household Food Security in Low-Income Households* (<https://www.ers.usda.gov/publications/pub-details/?pubid=84240>), used Food Security Supplement data from 2001-2014 to identify how changes in energy prices affect food insecurity. A 2016 ERS report, *Food Security Among Hispanic Adults in the United States, 2011-2014* (<https://www.ers.usda.gov/publications/pub-details/?pubid=44083>), examined the U.S. Hispanic population in more detail than is possible in the annual food security report because four years of data were combined. The data have also been used to examine relationships of food security with food programs and food spending. For example, an ERS research report, *Effects of the Decline in the Real Value of SNAP Benefits From 2009 to 2011* (<https://www.ers.usda.gov/publications/pub-details/?pubid=45102>), published in 2013 used the data to assess effects the reduction in the real value of SNAP benefits due to inflation in food prices on food spending and food security of low-income households.

Monitoring food security is also important for enhancing understanding of the general well-being of the American population. Food security, or assured access to enough food for an active, healthy life, is an important specific aspect of well-being. Food insecurity is undesirable in its own right, but also is a risk factor for more serious conditions of hunger, nutritional inadequacy, and associated health and developmental problems. As with other areas of specific need, such as inadequate access to health care or housing, food insecurity is symptomatic of compromised well-being in general.

The content of the questionnaire proposed for December 2019 is the same as that used in December 2017 and planned for December 2018. The 2019 instrument continues collection of household food expenditures and program participation information, as in previous years, since these factors are major correlates of food insecurity.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

This entire set of questions, as a supplement to the CPS, is designed to obtain the required information while keeping respondent burden to a minimum. The use of Computer Assisted Personal Interviewing (CAPI) and Computer Assisted Telephone Interviewing (CATI) is deemed the most appropriate collection method, given existing available information technology. The CAPI/CATI technology makes feasible the use of a multi-level screening pattern to reduce burden by skipping questions indicating more severe food insecurity if a household shows no indications of food insecurity on several less severe questions. The computerized instrument also skips inappropriate questions such as those about children's food security or use of child nutrition programs in households with no children.

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

Several items collected in this Supplement are collected on other Federal surveys. For example, the National Health and Nutrition Examination Survey (NHANES), conducted by the National Center for Health Statistics, includes the core food security items. The Census Bureau's Survey of Income and Program Participation (SIPP) has included a subset of the core food security items in its occasional Topical Module on Well-Being. The National Center for Education Statistics has included the core food security questions in several administrations of its Early Childhood Longitudinal Study (ECLS)—Kindergarten and Birth cohorts. The National Center for Health Statistics includes the adult food security module on the National Health Interview Survey (NHIS). However, these surveys are designed for specific research purposes, and while they are valuable for studying outcomes of food insecurity, they do not provide suitable data for timely and reliable monitoring of the prevalence and severity of food insecurity in the Nation's households and in critical subpopulations. NHANES has a relatively small sample and data are released only every two years. SIPP has a larger sample, but is longitudinal and has included only a partial food security module and only every several years. The ECLS surveys only cover households with children in selected age ranges and do not assess

food security every year. The NHIS only includes the adult food security module, does not have information on food expenditures, and State identifiers are not available in publicly released data. None of those surveys includes the full complement of follow-up questions on frequency and duration of food-insecure conditions nor the food spending and full range of Federal and community food and nutrition assistance program participation that are included in the CPS Food Security Supplement, and are important factors to be examined in conjunction with food security.

Other measures of food program impacts are important in the Nation's nutrition monitoring system, such as measures of dietary intakes and estimates of nutritional adequacy. These measures, while essential, are inadequate for monitoring the effects of rapid economic and program changes upon the food needs of the low-income population. The CPS-based measures of food insecurity are more parsimonious in the amount of data they require and are less burdensome to administer than dietary surveys. Consequently, the CPS-based measures lend themselves to use as national monitoring of households' economic access to adequate food.

5. Describe efforts to minimize burden on small business.

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

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

USDA plans to collect this information annually as a supplement to the December CPS. Annual tracking of these conditions will ensure that policy officials are aware of changes in a timely manner and will help increase understanding and awareness of the effects of economic, programmatic, and other factors on the ability of households to meet their basic food needs. Annual statistics are also needed as a "Key Performance Measure" to track progress toward a USDA strategic plan objective and annual data are important bases for research on economic, demographic, and programmatic factors affecting food security.

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

There are no special circumstances.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Notice of Intent to Request Extension of a Currently Approved Information Collection was published in the Federal Register on June 19, 2018 (Volume 83, Number 118, Pages 28409-28410). A copy of the notice is included as Attachment B. Two comments were received and are included as Attachments C-1 and C-2 along with the ERS reply. One comment expressed general dissatisfaction with food assistance programs and data collection related to them. The second comment requested a copy of the survey instrument.

ERS has consulted with a number of people outside the agency in developing plans for this data collection. Many experts from a broad range of disciplines and institutions were consulted during the development and refinement of the instrument that has been used in previous years. The questionnaire proposed for this data collection (essentially unchanged since 2011, except for standardizing a Spanish-language version of the questionnaire) and the burden calculation were reviewed by:

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James Ziliak, Gatton Endowed Chair in Microeconomics; Director of the Center
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9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

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

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

The Census Bureau will collect the Supplement data in compliance with 13 U.S.C. 182. Each sample household receives an advance letter approximately 1 week before the start of the initial CPS interview. (See Attachment D) This letter includes the information required by 13 U.S.C. 9, explains the voluntary nature of the survey, and states the estimated time required for participating in the survey. Field representatives must ask if the respondent received the letter and, if not, provide a copy and allow the respondent sufficient time to read the contents. Also, field representatives provide households with the pamphlet "The U.S. Census Bureau Respects Your Privacy and Keeps Your Personal Information Confidential." (See Attachment E) All information given by respondents to Census Bureau employees is held in strict confidence under 13 U.S.C. 9. Each Census Bureau employee has taken an oath to that effect and is subject to a jail penalty and/or substantial fine if he/she discloses any information given to him/her.

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

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

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

- 12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**
 - A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

An estimated 53,802 households will be interviewed each year. This estimated total sample is based on the average of the two years out of the last five years (2012-2016) with the largest numbers of sampled households in the survey. Most households will be interviewed one time per year in each of two successive years; the rest will be interviewed only one time. The estimated annual respondent burden for the total sample is 6,465 hours; an average respondent burden of 7.2 minutes for each of the 53,802 households expected to be in the Supplement universe. The estimate assumes an 80 percent response rate to the supplement and is based on the average proportion of sampled households that were asked each question in recent survey years (2012–16) and typical reading and response times for the questions. (Note that 2017 CPS-FSS data was not used in these calculations because it was not publicly available when these burden estimates were published in the 60-day Federal Register notice.)

An estimated 43,042 households will complete the Food Security Supplement (respondents). This estimate assumes an 80 percent response rate to the supplement. The average respondent burden is 8.8 minutes for each of the supplement respondents. This estimate takes into account screening within the supplement and the average proportion of respondent households that answered each section based on their screening status and presence of children.

An estimated 10,760 households will not complete the supplement (non-respondents). The average burden is 1 minute for supplement non-respondents. This estimate assumes that non-respondents only hear the one minute introduction to the supplement.

The table below provides a breakdown of the number of households expected to complete different parts of the Food Security Supplement questionnaire and average and total response time for households in each category based on recent CPS-FSS data collections (2012-16).

Current Population Survey Food Security Supplement	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	
CPS-FSS Total Sample (Respondents and Nonrespondents)	53,802	1	43,042	43,042	8.762	6,286	10,760	10,760	1	179	6,465 hours (7.2 minutes per household)
Detailed Burden Estimates by Screening Status of Respondents:											
1. Higher-income households screened out after food spending questions (average 12 questions)			23,457	23,457	6	2,346					
2. Households with children and either lower-income or screened in after food spending questions (average 33 questions)			6,999	6,999	14	1,633					
3. Households with no child and either lower-income or screened in after food spending questions (average 25			12,586	12,586	11	2,307					

questions)											
Total CPS-FSS Respondents			43,042			6,286					

About 55 percent of the respondent sample is expected to be households with incomes above 185 percent of the poverty line who indicate no food security problems on questions S9 and SS1 and therefore answer only the food expenditure and food sufficiency questions (S1 to S9 and SS1). The remaining respondents, lower-income households and households screened in based on S9 or SS1 (categories 3 and 4), will also answer questions about their food security and use of food and nutrition assistance programs. The number of questions these households answer depends on whether the household includes children and on how food-insecure the household is, as questions about more severe conditions are screened based on responses to questions about less severe conditions. Based on average responses in the 2012-2016 surveys, lower-income or screened in households with children will answer, on average, 33 questions and lower-income or screened in households with no child will answer, on average 25 questions.

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

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

In this Supplement, one respondent will answer for the entire household. No cost other than the respondents' time is incurred. The annualized cost of the respondents' time spent in answering the Supplement questions is estimated to be \$146,303. Cost of respondents' time is estimated based on the average hourly earnings of production and non-supervisory private-sector employees (\$22.63 per hour in June 2018, as estimated by the U.S. Bureau of Labor Statistics; <https://data.bls.gov/timeseries/CES0500000008>) multiplied by the total response time for all respondents and non-respondents (6,465 hours)

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The cost to the Government of the Current Population Survey program of data collection, to which this collection is a supplement, is borne by the Census Bureau, the Bureau of Labor Statistics, and other Government agencies, if involved. The Census Bureau estimates the cost of the Food Security Supplement for December 2018, including related development costs and public-use data provision costs, to be \$670,000 in fiscal year 2019. This cost is borne by ERS and supported through an interagency transfer to the Census Bureau.

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

Total estimated burden for the December 2019 supplement is somewhat higher (by 15 hours or 0.23 percent) than that estimated in the previous submission for this supplement (submitted in 2015). The slight adjustment is due to differences in how the burden estimates were calculated. The current estimated total number of respondents is based on the average of the two years out of the last five years with the largest numbers of sampled households in the survey (2012 and 2014 were the two recent years with the largest sample). The current calculations also assume an 80 percent response rate (or 20 percent nonresponse), while actual recent response rates have been slightly lower. The previous submission based burden estimates on the 2013 and 2014 CPS-FSS and actual response rates. Thus the assumptions of the revised estimates represent the highest likely possible burden. A change in average incomes or National economic conditions, could result in a change in actual burden for future supplements.

The cost of the food security supplement increased (by \$70,000 or about 12 percent) from the previous submission. This change was due to the increased costs of conducting surveys. The adjustment was made after several years of no changes in the cost of the supplement.

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

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

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

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

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

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

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