

**Supporting Statement**  
**National Agricultural Workers Survey**  
**Office of Management and Budget Control No. 1205-0453**

**Introduction**

The Department of Labor (the Department), Employment and Training Administration (ETA) requests approval to continue the National Agricultural Workers Survey (NAWS) without changes. The NAWS is a survey of the demographic, employment, and health characteristics of hired crop workers.

**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.**

Collecting information on hired crop workers is necessary to assess the supply-side of the crop labor market, including monitoring the terms and conditions of agricultural employment, estimating crop worker attachment to the farm labor market, and evaluating the human resources that are important inputs to the nation's perishable crop agriculture sector.

The NAWS is unique; it is the only national survey on the demographic, employment, and health characteristics of hired crop workers. The Department has administered the survey since 1988 to help meet its information needs and those of several other Federal agencies. The NAWS is particularly valuable for its ability to estimate the share of crop workers who are eligible to participate in and/or receive services from Federal farm worker programs.

Appropriators annually allocate approximately \$1 billion per year to Federal farm worker programs, including those administered by the Department (National Farmworker Jobs Program (NFJP)), the Department of Health and Human Services (HHS) (Migrant Health and Migrant and Seasonal Head Start), and the Department of Education (ED) (Migrant Education). NAWS data are key for understanding changes in and estimating the sizes of populations that are eligible to receive services from these programs. The Wagner-Peyser Act, as amended (29 USC 49f (d) and 49l -2(a)), authorizes the Department to collect this information.

Over the next year, ETA's goals for the NAWS are to:

1. Continue to administer the supplemental questions on preventive health, mental health, use of digital information devices, and education and training that ETA added

- to the survey in fiscal year (FY) 2018, in support of ETA and Federal partner information needs;
2. In concert with NAWS Federal partners and other survey stakeholders, develop and test new questions on job satisfaction, attachment to the farm labor market, and exposure to labor-saving technology for potential inclusion in the survey in FY 2021 (the data derived from these questions will help to identify training and personnel management practices to attract and retain a reliable labor force);
  3. Explore with NAWS Federal partners and other survey stakeholders the feasibility of expanding the NAWS to include additional agricultural worker populations;
  4. Develop new methods and practices for disseminating the survey's findings, such as creating data tables online, and providing webinars on how to access and use the public data files;
  5. Continue assessing and improving the survey's methodology to decrease costs, identify and reduce sources of survey design effects, and determine whether employer non-response warrants additional methodological changes; and
  6. Establish a regular release schedule for public access data and other dissemination products.
- 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.**

ETA will use the data to report on the demographic, employment, and health characteristics of hired crop workers. ETA will disseminate the survey's findings through biennial national summary reports and annual public data files and data tables, similar to those that are available on the NAWS Web site: <https://www.doleta.gov/naws/>. In addition, ETA will use the data, along with United States Department of Agriculture's (USDA) Census of Agriculture and Agricultural Labor Survey data, in the NFJP allocation formula to estimate each state's share of crop workers and crop worker dependents who are NFJP-eligible, as it has done multiple times since 1999.

Other routine users of the data will include USDA's Economic Research Service (ERS), the Department of Commerce's (DOC) Bureau of Economic Analysis (BEA), and HHS's Health

Resources and Services Administration (HRSA). These agencies will use the data to estimate agricultural productivity and international transactions accounts, and assess crop workers' health status and utilization of health services, respectively.

Previous collections of NAWS data have been widely used. Examples include:

- In January 2015, the Legal Services Corporation (LSC), a quasi-governmental agency, utilized NAWS data in a new formula to estimate the number and geographic distribution of agricultural workers who are eligible for LSC-funded legal services. The LSC will use NAWS data for the same purpose in 2020.
- Between 2008 and 2017, the Administration for Children and Families (ACF) used the NAWS to meet a Congressional mandate to collect data on farm workers' barriers to participating in the Migrant and Seasonal Head Start (MSHS) program. ACF also used the data to estimate the number and distribution of the MSHS-eligible population. Since 2012, ACF has released five NAWS-based reports and briefs, including two in June 2019: *Household Composition of Families Eligible for Migrant and Seasonal Head Start: Findings from the 2012-2016 National Agricultural Workers Survey*, and *Language, Literacy, and Educational Backgrounds of Parents from MSHS-Eligible Households: Findings from the 2012-2016 National Agricultural Workers Survey*.
- The Congressional Budget Office (CBO) has used NAWS data to estimate the economic impacts of immigration legislation. In 2013, CBO used NAWS data to score S.744, "The Border Security, Economic Opportunity, and Immigration Modernization Act." Specifically, CBO used NAWS data to estimate the number of crop workers and their dependents who would qualify for earned legalization. CBO similarly used NAWS data to score H.R. 1773 "The Agricultural Guestworker Act".

**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.**

ETA is modernizing NAWS field applications. In 2019, ETA required its NAWS contractor to begin testing computer-assisted personal interviewing (CAPI) technology to administer the NAWS questionnaire. Additionally, ETA approved the contractor's request to develop a mobile application for real-time data entry of sampling information and to use Global Positioning System (GPS) units to locate sampled employers.

Through testing, the NAWS contractor adopted interviewing equipment that operates as both a tablet and laptop. This versatility allows NAWS interviewers to use a tablet, via touchscreen or stylus, when standing up or in tight places, or a laptop when seated.

Although ETA anticipates benefits from the use of the CAPI technology, to date it does not have sufficient data to estimate savings in cost or reduction in burden.

The NAWS contractor believes that paper questionnaires are the optimal medium for collecting information in some situations. For example, a long questionnaire occasionally makes the paper questionnaire the efficient medium for meeting the time constraints of interviewing workers on breaks, at lunch, and before and after work. Additionally, some interviewers prefer not to have technology intrude when attempting to obtain access to an employer's workers.

ETA's NAWS contractor also developed an application, *NAWS Mobile*, to take advantage of the CAPI hardware's flexibility. With this application, NAWS managers have access to real-time information on employer-contact and worker-sampling data.

As internet and cell coverage are spotty in many rural areas, ETA's NAWS contractor has also provided its interviewers small GPS units. Interviewers use the units, which they place on their vehicle's dashboards for hands-free navigation, to locate sampled employers' operations. This satellite-based system has reduced the time required to locate sampled employers.

ETA will assess how the use of this information technology affects respondent burden. In the meantime, all interviews will continue to be conducted in-person.

**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.

Prior to the NAWS, USDA/ERS collected information on farm workers 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. Before it launched the NAWS in 1988, the Department also considered the USDA's Farm Labor Survey, now the Agricultural Labor Survey (ALS), as a means to collect information on hired crop workers. The ALS collects wage and other employment data at the national and regional level. However, USDA administers this survey to

employers and personnel managers. As such, the Department determined that it could not use the ALS to describe the characteristics of hired crop workers.

The Department also considered using the Quarterly Census of Employment and Wages (QCEW) to evaluate the characteristics of hired crop workers. The QCEW, however, does not collect the demographic, employment, and health data that the Department and many Federal agencies need to inform their programs. The Department determined that only a survey that was both personally administered and establishment based 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 crop workers. The crop 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 creating the worker frame.

To reduce burden on both agricultural employers and crop workers, a stratified sample is used to represent the national population of crop 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, crop 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 farm employment 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 07/25/2019 (84 FR 35886), seeking public comment on the continuation of the survey, without change. ETA received eight letters in response to this notice. Six letters contained comments and each expressed support for the continuation of the NAWS. The remaining two letters were requests for copies of the questionnaire and supporting statement and are not included in ETA's summary, below.

Of the six letters containing comments, two entities wrote to support the continuation of the survey and did not suggest any changes to it. The remaining four entities wrote to support the continuation of the survey and suggest new questions or design changes. The comments and ETA's responses to them are summarized, below, in Table 1.

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

<b>Supports Continuation</b>	<b>ETA's Response</b>
<p><i>Two commenters expressed support for the continuation of the survey but did not suggest any changes.</i></p> <hr/> <p>One commenter wrote to support the continuation of the survey because it has served as a main data source for important components of economic statistics since 1997 and these data are not obtainable elsewhere. Data from the NAWS are used to estimate the U.S. international transactions accounts and gross domestic income. More specifically, they are used to estimate compensation of migrant agricultural workers. The commenter recommends the survey continue in order to facilitate the</p>	<p>ETA appreciates knowing how NAWS data are used. Although this commenter did not recommend survey changes, ETA will follow up with the commenter to inquire if future changes to the survey would improve</p>

<p>continuation of compensation estimates.</p> <p>Another commenter supports the continuation of the survey because it is the most comprehensive survey of agricultural workers publicly available in the United States and is conducted on an annual basis. The NAWS dataset is critical to understanding agricultural workers in the United States. More specifically, NAWS has been an important tool for research focused on Latino agricultural and entrepreneurship issues.</p>	<p>the utility of the NAWS for the described data use.</p> <p>ETA is pleased to learn that the NAWS is an important data source for research on entrepreneur- ship issues.</p>
<p><b>Supports Continuation and Suggests New Questions or Design Changes</b></p> <p><i>Four commenters expressed support for the continuation of the survey and suggested new questions or design changes.</i></p> <hr/> <p>The first commenter supports the continuation of the survey because it provides the best, national random sample of seasonal agricultural workers. Additionally, the data set has been valuable for research and informing public policy.</p> <p>The second commenter supports the continuation of the survey because it serves as an objective measure and is important in allocating resources for government programs. Furthermore, the commenter stated the survey is not burdensome and the current methodology has high validity. The commenter recommended the continued use of in-person interviews.</p> <p>The third commenter supports the continuation of the survey because it serves as a valuable and distinctive source of data that identifies the barriers unique to the respondents.</p> <p>The fourth commenter supports the continuation of the survey because of the need for data on U.S. farm workers that informs evidence-based policies and programs. Additionally, the dataset is used to understand demographic trends, inform policy advocacy, and develop community projects.</p> <hr/> <p><b>New Questions</b></p>	<p><b>ETA’s Response</b></p> <p>ETA is pleased to learn that the NAWS serves multiple information needs.</p>

<p><i>Health Variables</i>          There were two suggestions for asking respondents and dependent household members about their current health conditions. In addition, it was suggested that detailed information about agricultural task and personal hygiene practices be collected in an effort to connect working conditions with health conditions or risk.</p> <p><i>Education and Training</i>          There was one suggestion for asking respondents for more detailed information on education and training in order to study the effect of education and training programs on earnings, hours worked, and other decisions by respondents.</p> <p><i>Digital Literacy</i>          There was one suggestion for asking respondents new questions on digital literacy to facilitate evaluations of digital initiatives. Specifically, the National Broadband Plan.</p> <p><i>Welfare Assistance</i>          One commenter suggested adding questions on the use of government and private welfare and other assistance by undocumented workers.</p> <p><i>Government Immigration Enforcement</i>          One commenter suggested adding questions, if feasible, to collect information on workers' opinions about their risks from government immigration enforcement.</p>	<p>In FY 2018, ETA added many supplemental questions to the survey which need to be administered for another year before new questions may be considered. The supplemental questions cover many domains that these commenters suggested, including preventive health, mental health, access to and use of digital information devices, and education and training.</p> <p>ETA will follow up with these commenters for additional input on the recommended question domains and determine, in concert with NAWS Federal partners and other survey stakeholders, how best to address the recommendations.</p>
<p><b>Design Changes</b></p> <p><i>Types of Workers</i>          Three commenters suggested expanding the types of workers the survey currently includes. Two commenters suggested the survey include each of the following types of workers: workers with H-2A visas, workers in additional agricultural industries not involved in seasonal crop work (livestock, reforestation, fish farming, etc.), and seasonal farmworkers not currently employed in agriculture during the interview period. Additionally, one commenter suggested including retired farmworkers.</p> <p><i>Follow Workers Over Time</i></p>	<p><b>ETA's Response</b></p> <p>One of ETA's goals for the survey over the next year is to consult with NAWS Federal partners and other survey stakeholders on the recommendation to expand the NAWS to include other agricultural worker populations.</p> <p>Although additional</p>

<p>One commenter suggested following workers over time. The suggestions included following the same workers over time or following workers in a given area systematically over time.</p>	<p>information about agricultural work patterns, occupational exposures, and attachment to the farm labor market could be obtained through a prospective cohort design, this approach would entail a substantial increase in resources, which are not currently available. Interviewing a subset of crop workers over time would be less costly. ETA will consider this recommendation, in concert with its NAWS Federal partners and other survey stakeholders, over the next year.</p>
<p><i>Information Collection</i> There were two suggestions regarding information collection. One commenter suggested the U.S. Department of Labor seek input from stakeholders such as farmworkers, farmworker advocates, and farmworker-serving organizations when developing the survey. In addition, one commenter suggested collecting information from workers' employers.</p>	<p>ETA will continue seeking input from all survey stakeholders in the development of the NAWS, including the recommended entities and agricultural employers.</p> <p>ETA will follow up with this commenter about the recommendation to collect information from farm workers' employers. Although crop workers' demographic, employment, and health characteristics will remain a focus of the survey, ETA recognizes that a small number of questions concerning</p>

<p><i>Data</i>          One commenter made two suggestions regarding the release of data. First, it was suggested to institute a regular data release schedule. Second, the commenter suggested releasing the data more quickly after collection.</p> <p><i>Definitions</i>          It was suggested that, for the question about worker, spouse, and child enrollment in government health insurance, the definition of “health insurance provided by the government” be clarified to include options beyond Medicaid or Medicare.</p>	<p>agricultural employers’ operations, if included in the NAWS, could improve the utility of the primary data the survey collects.</p> <p>One of ETA’s goals for the NAWS over the next year is to establish a regular release date for reports and public data files.</p> <p>Contingent on the availability of resources, ETA will consider releasing national summary reports annually. Beginning in FY 2021, and contingent on the availability of resources, ETA will annually release NAWS public data files.</p> <p>ETA will follow up with this commenter and subject matter experts to determine how best to clarify this health insurance response category.</p>
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**9. 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.**

The Department consults with many outside Federal departments and agencies regarding the availability of information on the demographic, employment, and health characteristics of farm workers, including the Departments of Agriculture, Commerce, Education, Health and Human Services, Homeland Security, and the Environmental Protection Agency. 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 ALS. None of the USDA or ALS data, however, overlaps with NAWS data.

In the last year, ETA has also consulted with the National Institute for Occupational Safety and Health, health experts at NIOSH-funded agricultural health and safety centers, and grantees of ACF, ETA, and HRSA about the NAWS questionnaire and the survey's findings. In addition, ETA and the NAWS contractor have presented overviews of the survey and its findings to agricultural employer associations and farm worker advocates. Stakeholders provided valuable feedback on the survey at these meetings.

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

Crop 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.

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 \$30,000 (1,500 responses x \$20).

**11. 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, health, and recruitment practices. NAWS interviewers inform respondents that their information will be kept private to the extent possible under the law to help them overcome any resistance to discussing these issues. Interviewers also inform respondents of the purposes of the information collection as well as the safeguards to protect their privacy.

NAWS interviewers also inform respondents of the limitations concerning the privacy assurance. Specifically, interviewers inform respondents 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 privacy and will not release them.

Interviewers swear to protect the privacy of both agricultural employers and crop worker respondents. To protect the identity of agricultural employers, only the direct-hire employees of the contractor who are 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 to locate hired crop workers. Workers are interviewed alone to protect their privacy. Additionally, ETA's System of Records for the NAWS, which was established under the Privacy Act (5 USC 552a), will protect respondents. At the conclusion of the survey, ETA will destroy all records of names and addresses.

**12. 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.**

The health questions are likely the most sensitive. The privacy assurances, as well as the rapport that develops between the interviewer and respondent, however, make them less intrusive. Federal agencies with mandates concerning the health status of farm workers need the information that is made available by the 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.

**13. 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 45 minutes to administer this questionnaire. This estimate is based on: 1) the contractor's 28 years of experience administering the NAWS; and 2) mock interviews with contractor staff, including interviewers. The estimated average time is comparable to the average time required in previous administrations of the NAWS after accounting for efficiencies interviewer staff have gained administering the questionnaire.

Assuming a crop worker's time is worth \$13.80 per hour <https://downloads.usda.library.cornell.edu/usda-esmis/files/x920fw89s/ks65hn76b/7h14b065g/fmla0519.pdf> and there are 1,125 crop worker burden hours, the total cost is \$15,525 of worker time.

The NAWS is an establishment survey. As such, interviewers need to contact employers to seek permission to sample their workers. In FY 2017, the NAWS contractor interviewed

1,238 workers on 324 farms, or about 3.8 workers per farm. Interviewers contacted a total of 3,703 farms and determined that 748 of them were eligible to participate in the survey because they were employing crop workers when interviewers arrived to speak with the employer, for a farm eligibility rate of 20 percent ( $748/3,703 = 20\%$ ). Interviews were conducted at 324 of the eligible farms, for a response rate of 43 percent ( $324/748 = 43\%$ ). Assuming the establishment eligibility and response rates in FY 2020 will be at least 20 percent and 43 percent, respectively, then interviewers will need to approach and invite approximately 4,590 establishments to participate in the survey in order to interview 1,500 farm workers on approximately 395 farms (target sample size  $\div$  interviews per farm  $\div$  eligibility rate  $\div$  response rate = total establishments to contact):

$$1,500 \text{ interviews} \div 3.8 \text{ interviews per farm} \div .20 \div .43 = 4,590 \text{ establishments to contact}$$

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 \$38.43 per hour <https://www.bls.gov/oes/current/oes119013.htm> and the number of burden hours is 490, the total cost is \$18,831 of employer time.

**Table 2. Estimated Burden Hours Associated with the FY 2020 NAWs \***

Who will be interviewed/contacted?	Survey Instrument	Respondents per Year	Average Time per Respondent	Total Hours
Crop Workers	Primary Questionnaire	1,500	45 minutes	1,125
Ineligible Employers	Point of Contact Only	3,672	5 minutes	306
Eligible Employers	Point of Contact Only	918	12 minutes	184
Total		6,090		1,615

\* These estimates are based on previous administrations of the NAWs. Survey background information is available at: <https://www.doleta.gov/naws/>.

**14. 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.

**15. 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 2020 is \$4,275,581. This includes the cost of the contract (\$4,138,487) and ETA employee time (\$137,094). The labor category in Table 3, below, includes project management, data collection, coding, analysis, and dissemination.

**Table 3. Estimated Total Survey Costs for FY 2020**

Category	Hours	Cost
Labor	40,856	\$3,192,744
Airfare		\$114,858
Per Diem		\$490,808
Ground Transportation		\$137,725
Other Direct Costs		\$176,403
G&A on Other Direct Costs		\$25,949
ETA Employee Time	1,878	\$137,094
Total	42,734	\$4,275,581

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

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

There will be a total decrease of 2,312 burden hours (see Table 4 below), most of which is associated with changes to sample size. ETA based the previous burden estimates on a target sample size of 3,369 crop workers. However, funding was only available to interview approximately 1,500 crop workers in each of the last two years. ETA assumes that FY 2020 funding will support a sample size of 1,500. This change accounts for a decrease of 2,244 hours.

ETA attributes another part of the decrease in burden hours to the cessation of the ACF – sponsored supplemental questions on childcare, after FY 2017. This change accounts for a decrease of 67 hours.

There is an increase of 107 hours associated with contacts with ineligible employers. Two factors are associated with this increase: 1) the employer eligibility rate; and 2) the average number of crop workers interviewed per farm. In the last submission, the employer eligibility rate was 38 percent. With this submission, ETA assumes that the eligibility rate will be 20 percent, i.e., the rate it was in FY 2017 (the last year for which these data are available). The lower eligibility rate means that interviewers need to contact more employers to identify eligible employers. The average number of crop workers interviewed per farm has also decreased (from 4.8 to 3.8), which means that interviewers need to contact more eligible employers to interview the target sample size of crop workers.

Lastly, there is a decrease of 108 hours associated with contacts with eligible employers. This decrease obtains because the target sample size of crop workers has decreased from 3,369 to 1,500, after accounting for the decrease in the average number of interviews per farm.

**Table 4. Change in Burden Hours Associated with the FY 2020 NAWs**

Respondent Type	Respondents per Year		Average Time per Respondent (minutes)		Total Hours		Change (Hours) FY 2020
	Previous	New	Previous	New	Previous	New	
Farm Workers	3,369	1,500	60	45	3,369	1,125	- 2,244
Farm Worker Parents with Children Less than Six Years old	674*	0	6	0	67	0	- 67
Ineligible	2,385	3,672	5	5	199	306	+ 107

Employers							
Eligible Employers	1,462	918	12	12	292	184	- 108
<b>Total</b>	7,216	6,090			3,927	1,615	- 2,312

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

**17. 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 NAWS contractor produces national level summary reports and public data files. The next report, which will summarize data that was collected in fiscal years 2017-2018, will be available on the NAWS Web page in winter 2019.

ETA has been updating the NAWS public data file biennially. The current file contains data from fiscal years 1989 through 2016. The next data file will contain two more years of data, i.e., 1989-2018. ETA anticipates releasing it on the NAWS Web page along with the national level summary report in winter 2019.

**18. 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.

**19. 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**

Ryu, E., Couper, M., & Marans, R. (2006) Survey incentives: Cash vs. in-kind; Face-to-face vs. mail; Response rate vs. nonresponse error. *International Journal of Public Opinion Research*, 18 (1): 89-106.

Zhang, F. (2010). Incentive experiments: NSF experiences. (Working Paper SRS 11-200). Arlington, VA: National Science Foundation, Division of Science Resources Statistics.