

**Supporting Statement for  
National Agricultural Workers Survey  
OMB Control Number: 1205-0453**

This information collection request (ICR) seeks to revise 1205-0453, National Agricultural Workers Survey.

**A. Justification**

This request is to add questions to the National Agricultural Workers Survey (NAWS) to gather retrospective information on employment, health, and safety and health practices among agricultural workers during the Coronavirus pandemic. The NAWS is an ongoing national survey of the demographic, employment, and health characteristics of hired crop workers.

The Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health (CDC/NIOSH) is co-sponsoring this collection, which will be coordinated with the Department of Labor (DOL), Employment and Training Administration's (ETA) NAWS ICR (OMB Control No. 1205-0453). The current NAWS ICR is authorized until January 31, 2023.

The proposed questions will supplement NAWS demographic, employment, and health data. These data are not currently collected by any national survey.

The additional employment information to be collected is:

- Whether the respondent missed any days of work in the last 12 months due to illness or fear of being ill.
- Where applicable, the number of missed work days in the last 12 months that were related to COVID-19.
- Whether the respondent worked any days in the last 12 months while ill.
- Whether the respondent or anyone in the respondent's household received a COVID-19 benefit in the last 12 months.

The additional health information to be collected is:

- Whether the respondent has been diagnosed with COVID-19.
- Whether COVID-19 prevented the respondent from seeking health care.
- Whether the respondent faced any barriers to being tested for COVID-19.
- Whether the respondent has been vaccinated against COVID-19 and, if in the U.S., where they were vaccinated.
- Where applicable, the reason(s) why the respondent has not been vaccinated.
- Whether the respondent screens positive for depression.

The additional safety and health information to be collected is:

- Where applicable, information on safety and health protocols in employer-provided, rent-free housing.

- Whether there are COVID-19 safety and health protocols in place at the respondent's farm job at the time of the interview.

The yellow highlighted items in Attachment A, NAWS Questionnaire Cycle 102, constitute the questions and response categories for this request.

**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 farm workers is necessary to assess the supply-side of the farm labor market, including monitoring the terms and conditions of agricultural employment, estimating farm 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 supplemental COVID-19 questions are important because farm workers are essential workers and many have continued to work during the pandemic. Although infection rates in the United States are declining, farm workers may be at increased risk for infection and there could be future waves of the virus.

The information obtained will provide national-level data on the effects of the Coronavirus pandemic on the employment, health, and health care access of an essential workforce. The information from this collection will also enhance the ability of federal, state, and local agencies to respond to agricultural employee and employer needs for information, health care and testing, and employment training related to COVID-19.

CDC/NIOSH developed the supplemental questions in collaboration with CDC's Division of Global Migration and Quarantine (DGMQ), the Health Resources and Services Administration (HRSA), ETA, and organizations that represent agricultural employers and farm workers. The proposed questions are similar to questions used in the California Institute for Rural Studies' COVID-19 Farmworker Survey and the National Health Interview Survey.

DOL respectfully requests OMB approval of this revised collection by no later than February 15, 2022, so that the next NAWS interview cycle will contain these important COVID-19 related questions.

The NAWS is the only national survey on the demographic, employment, and health characteristics of hired crop workers. DOL has administered the survey since 1988.

The Wagner-Peyser Act, as amended (29 USC 49f (d) and 49l-2(a)), authorizes DOL to collect this information.

**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 data from the supplemental questions will permit CDC/NIOSH, HRSA, ETA and other agencies to measure the extent to which farm workers experienced worksite health and safety procedures related to COVID-19, accessed testing, health care, and special benefits during the pandemic, intend to or have been vaccinated, and identify ongoing needs for resources or education to prevent COVID-19 transmission.

The questions on diagnoses of and testing for COVID-19 will provide CDC/NIOSH and HRSA with better information on the prevalence of COVID-19 among agricultural workers, where agricultural workers received care, and inform the need for additional resources.

The information on depressive symptoms, which will be obtained by administering two questions from the Patient Health Questionnaire (PHQ-2), will be useful to community and migrant health centers, and federal, state, and local agencies that provide health services to agricultural workers. Outreach focused on protecting farm worker mental health has implications for mental health service delivery and health care utilization in general, as poor mental health is associated with increased levels of health care utilization.

The information gathered on PHQ-2 may be used in several ways. CDC/NIOSH can use the information to understand if additional screening or resources are needed. Researchers in multiple disciplines can use the information to describe and study the occupational health of farm workers 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.

**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 a paper questionnaire is 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 A.2 above.**

There are no national-level information collections on the demographic, employment, and health characteristics of hired crop workers that would render the NAWS duplicative. Moreover, there are no national-level information collections on COVID-19 preventive strategies for farm workers.

Prior to the NAWS, the United States Department of Agriculture's (USDA) Economic Research Service 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 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, DOL also considered the USDA's Farm Labor Survey (FLS) as a means to collect

information on hired crop workers. The FLS collects wage and other employment data at the national and regional level. However, USDA administers this survey to employers and personnel managers. As such, DOL determined that it could not use the FLS to describe the characteristics of hired crop workers.

DOL 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 DOL and many Federal agencies need to inform their programs. DOL 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.

The twelve-month look-back period in the NAWS provides a unique opportunity to learn about the effects of the Coronavirus pandemic on an essential workforce. If these data are not collected, CDC/NIOSH, HRSA, ETA and other Federal agencies will not fully understand the effects of the pandemic on agricultural workers.

Preliminary data from COVID-19 supplemental questions could be available as early as June 2022.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances for this collection. 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.**

**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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

As required by the Paperwork Reduction Act of 1995 (44 USC. 3506(c)(2)(A)), ETA published a notice in the Federal Register on 09/03/2021 (86 FR 49569), seeking public comment on the continuation of the survey, without change. Three entities responded to the notice. Each entity expressed support for the continuation of the NAWS and two entities suggested new questions or modifications to proposed questions. 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>Public comments on proposed questions</b>	<b>ETA Response</b>
<p>One commenter wrote to support the continuation of the survey but did not ask for any modifications. This commenter supports the NAWS 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 continuation of compensation estimates.</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 the utility of the NAWS for the described data use.</p>

<p>Another commenter supports the continuation of the survey because it is the only national, government-sponsored survey of U.S. crop workers, and it continues to be a valuable and unique source of demographic, labor, and health information of U.S. farm workers and their families. The commenter stated that they regularly refer to NAWS data to understand demographic trends among farm workers, inform policy advocacy, educate the public and stakeholders, and develop effective community projects.</p>	<p>ETA appreciates knowing that the NAWS data are useful for these purposes. This commenter’s suggestions are included in the items below.</p>
<p>One comment suggested modifying response category “s” to question G4 on COVID-19 benefits (a question on types of benefits and services used). The suggestion was to broaden the response category by deleting the qualifier “unemployment”.</p>	<p>ETA agrees and will remove the wording “unemployment” from the response category.</p>
<p>One commenter suggested adding a question about whether the respondent had sick leave available from their employer if diagnosed with COVID-19 or caring for a family member with COVID-19.</p>	<p>ETA will broaden response category “s” to question G4 on COVID-19 benefits to include all benefits. Additionally, any COVID-19 related out of work period would be noted on the respondent’s work grid and the COVID-19 related reason listed. Several common reasons are pre-assigned codes, and any other COVID-19 related reasons would be detailed in the “Other” option.</p>
<p>One commenter suggested asking the vaccination status of each household member on the household grid.</p>	<p>ETA understands the importance of identifying whether household members have been vaccinated. However, farm worker households can include persons who are not residing with the farm worker respondent. Sometimes, household members are residing in another country. Given the complexities of farm worker households, ETA does not believe the data on household member vaccination status would be of high quality. In addition,</p>



	<p>asking about the vaccination status of each household member would add substantial burden to this information collection.</p>
<p>Two commenters suggested that questions be asked about COVID-19 testing and diagnosis for household grid members.</p> <p>One commenter suggested asking whether each individual on the household grid had tested positive for COVID-19.</p> <p>There were two suggestions for asking about household members as a group rather than individually, one commenter suggested asking specifically if anyone in the household tested positive for COVID-19. The other commenter suggested asking whether others in the family or household have been diagnosed with COVID-19.</p>	<p>ETA understands the importance of identifying whether household members have been tested or diagnosed with COVID-19. However, and as noted above, ETA does not believe information on these domains, which would be obtained from the farm worker respondent about household members, would be of high quality.</p>
<p>One commenter suggested adding to question D66, on employer-provided housing, to inquire if there are requirements for vaccination and routine rapid-turnaround testing.</p>	<p>ETA appreciates the comment. Common responses to question D66 are pre-coded. If respondents answer that vaccination or testing was required, interviewers will include those responses under “Other”. If these are common responses, they will be moved to pre-coded responses. Additionally, this information collection request already proposes adding questions on the respondent’s vaccination status, COVID-19 testing, and worksite safety practices. The questionnaire offers the opportunity to analyze information provided by respondents in congregate housing to see if they are vaccinated and tested.</p>

<p>One commenter suggested asking four follow up questions about vaccination. The first would be when the respondent received their initial vaccination. The second would be the type of vaccine received. The third and fourth follow up questions should be whether the respondent had received a booster and when.</p>	<p>ETA understands the importance of vaccination information. The proposed supplement asks whether the respondent has been vaccinated. Policies around booster shots are changing and current recommendations vary depending on the vaccine type. All four follow up questions would need to be answered accurately to assess the validity of booster shot data. Additionally, there is concern for the respondent’s recall of injection dates. For this initial administration of the questions, ETA will not be including questions on booster shots. ETA will investigate this issue further with its partners and consider adding booster shot information to a future version of the supplement.</p>
<p>One commenter requested that if the respondent was vaccinated, there be a follow up question asking where the respondent received the vaccine (i.e., health clinic, at the worksite, community vaccination event).</p>	<p>ETA agrees that where the vaccination occurred is important and will add follow up questions asking in what country the respondent was vaccinated and if in the U.S., at what type of facility.</p>
<p>One commenter requested that the codes for being out of work should include a code for “quarantined”.</p>	<p>ETA agrees that it will be useful to add “Quarantined” to the list of activity codes for out-of-work periods on the work grid (which includes their employment history over the past one-year period).</p>

<p>There were three questions about worksite safety. One commenter</p>	<p>ETA agrees that worksite safety is important. Question NV1 asks about worksite health and safety protocols</p>
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<p>requested that the NAWS add a question asking what safety and health protocols were implemented at the respondent’s worksite (i.e., masks, social distancing, handwashing stations, quarantine, etc.).</p> <p>A second commenter suggested there be a question on rapid-turnaround testing.</p> <p>One of the commenters also requested that ETA include asking whether COVID-19 safety and health protocols in the respondent’s workplace have changed during the course of the pandemic.</p>	<p>related to COVID-19 and includes options for masks and social distancing as well as whether soap or sanitizer is available for handwashing. A specific question on hand washing (NS9) is asked just before question NV1. ETA will include quarantine on the work grid for workers coming in contact with or contracting COVID-19.</p> <p>ETA conferred with NAWS partner NIOSH regarding asking about rapid-turnaround testing. This question would likely require explanation and is complicated by possible employer vaccine mandates. For these reasons, ETA is not asking the question at this time.</p> <p>Answers to questions about changes over the course of the pandemic will likely include missing and low-quality (and possibly biased) answers as some respondents may be new to farm work or new to their employer and not have this information.</p>
<p>One commenter asked whether ETA could you add a question as to whether the respondent has ever been told by a health care provider they are obese or overweight.</p>	<p>ETA understands that obesity is an important co-morbidity for COVID-19. However, the question is a sensitive one and for this reason might be misreported. Additionally, many respondents do not visit a provider. Also, providers differ in their need or willingness to discuss this, a factor that may be affected by the cause of the visit.</p>

ETA consults annually 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, 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 FLS. None of the USDA or FLS data, however, overlaps with NAWS data.

In the last year, ETA also consulted with health experts at CDC/NIOSH-funded agricultural health and safety centers, and Federal Project Officers and grantees of

ETA, HRSA, and the Administration for Children and Families about the NAWS questionnaire and the survey's findings. In addition, ETA and the NAWS contractor presented overviews of the survey and its findings to agricultural employer associations and farm worker advocates. Stakeholders provide valuable feedback on the survey at these meetings.

**9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.**

With this request, ETA is seeking approval to increase the honoraria incentive to respondents by ten dollars, from \$20 to \$30. The incentive, which has not changed since FY 2000, helps offset the inconvenience and any expense incurred to participate. 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).

**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, 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.

**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.**

The health questions are likely the most sensitive. 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.

Of the proposed supplemental questions, those on depression from the PHQ-2 are likely to be the most sensitive. Based on responses to similar questions in current and previous administrations of the survey, however, CDC/NIOSH and ETA anticipate that the privacy assurances, as well as the rapport that develops between the interviewer and respondent, will make these questions less intrusive.

NAWS participants have responded well to previous questions on General Anxiety Disorder and depression. The data obtained from these questions were of high quality. Data from the PHQ-2 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. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “Annual Cost to Federal Government.”**

The calculations for burden hours and the annualized cost to respondents for the hour burdens are shown in Table 2, below.

On average, it will take 45 minutes to administer this questionnaire to crop worker respondents. This estimate is based on: 1) the contractor’s 32 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 \$15.08 per hour and there are 1,125 crop worker burden hours, the total cost of crop worker time is \$16,965.

The NAWS is an establishment survey and interviewers need to contact employers to seek permission to sample their workers. In FY 2020, the NAWS contractor sampled 1,210 crop workers and interviewed 1,119 of them, for a crop worker response rate of 92 percent ( $1,119/1,210 = .92$ ). These interviews were obtained on 324 farms (employers), or about 3.5 crop workers per farm (employer).

Interviewers contacted a total of 2,236 employers and determined that 721 of them were eligible to participate in the survey because they were employing crop workers when interviewers arrived to speak with the employer, for an employer eligibility rate of 32 percent ( $721/2,236 = .32$ ). Interviews were conducted at 324 of the eligible employers, for an employer response rate of 45 percent ( $324/721 = .45$ ).

Assuming the crop worker response rate, employer eligibility rate, and employer response rate in FY 2022 will be 92 percent, 32 percent, and 45 percent, respectively, then interviewers will need to approach and invite approximately 2,976 employers to participate in the survey in order to interview 1,500 crop workers on approximately 429 farms (target sample size  $\div$  interviews per farm<sup>1</sup>  $\div$  employer eligibility rate  $\div$  employer response rate = total employers to contact):

$1,500 \text{ interviews} \div 3.5 \text{ interviews per farm} \div .32 \text{ employer eligibility rate} \div .45 \text{ employer response rate} = 2,976 \text{ employers to contact.}$

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

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<sup>1</sup> The estimated number of interviews per farm, 3.5, accounts for the worker response rate of 92 percent.

agricultural employer's time is worth \$36.93 per hour and the number of burden hours is 359, the total cost of employer time is \$13,258.

**Table 2. Estimated Respondent Burden<sup>1</sup> and Cost Associated with the FY 2022 NAWS**

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Minutes)	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
Questionnaire Interview: Crop Workers	1,500	1	1,500	45	1,125	\$15.08 <sup>2</sup>	\$16,965
Point of Contact: Ineligible Employers	2,024	1	2,024	5	169	\$36.93 <sup>3</sup>	\$6,241
Point of Contact: Eligible Employers	952	1	952	12	190	\$36.93 <sup>4</sup>	\$7,017
<b>Total</b>	<b>4,476</b>		<b>4,476</b>		<b>1,484</b>		<b>\$30,223</b>

1. These estimates are based on previous administrations of the NAWS. Survey background information is available at: <https://www.doleta.gov/naws/>.
2. United States Department of Labor, National Agricultural Statistics Service, Farm Labor. May 26, 2021. Gross Wage and Base Wage Rates by Type of Worker – Regions and United States: April 11-17, 2021. Available at: <https://downloads.usda.library.cornell.edu/usda-esmis/files/x920fw89s/q237jp329/1g05g852h/fmla0521.pdf>
3. United States Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Statistics, Occupational Employment and Wages, May 2020, 11-9013 Farmers, Ranchers, and Other Agricultural Managers. Available at: [Farmers, Ranchers, and Other Agricultural Managers \(bls.gov\)](https://www.bls.gov/news.release/ocwage202005.pdf).
4. Ibid.

**13. Provide an estimate 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 estimate 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 service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software;**

- monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
  - **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

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

- 14. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.**

The estimated cost of the survey in FY 2022 is \$4,395,675. This includes base survey costs, costs associated with the COVID questions, and the increased incentive payment. The labor category in Table 3, below, pertains to NAWS contractor hours and includes project management, data collection (including travel hours), coding, analysis, and dissemination.



**Table 3. Estimated FY 2022 Survey Costs<sup>1</sup>**

Category	Base Hours	Base Cost	Additional Hours	Additional Cost	Total Hours	Total Cost
Labor	37,590	\$3,177,937	575	\$61,737	38,165	\$3,239,674
Airfare	NA	\$119,682	0	\$0	NA	\$119,682
Per Diem	NA	\$512,435	0	\$0	NA	\$512,435
Ground Transportation	NA	\$144,653	0	\$0	NA	\$144,653
Other Direct Costs, including G&A	NA	\$224,889		\$11471	NA	\$236,360
Total	37,590	\$4,179,596	575	\$73,208	38,165	\$4,252,804

1. 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 a net decrease of 131 burden hours (see Table 4 below), which is associated with corrections to the formula for estimating the number of employers that will need to be contacted in order to interview the target sample size of 1,500 crop workers over the three interview cycles of FY 2022.

Although ETA based the previous employer burden estimates on a target sample size of 1,500 crop workers, it incorrectly included in its estimate of employer burden the hours associated with employers who couldn't be located and screened for eligibility. There is no employer engagement (burden) when the employer can't be located and screened for eligibility. Correcting this calculation resulted in a decrease of 137 burden hours.

There is an increase of 6 hours associated with contacts with eligible employers. Two factors are associated with this increase: 1) the employer eligibility rate; and 2) the average number of crop workers interviewed per employer. In the last submission, the employer eligibility rate was 38 percent. With this submission, ETA assumes that the eligibility rate will be 32 percent, the rate it was in FY 2020. The lower eligibility rate means that interviewers will need to contact more employers to identify eligible employers. The average number of crop workers interviewed per farm has also decreased (from 3.8 to 3.5), which means that interviewers will need to contact more eligible employers to interview the target sample size of crop workers.

The net change in burden hours is – 131 (-137 + 6 = -131).

Although ETA is seeking approval to add new questions to the NAWS with this request, the average time per crop worker respondent remains at 45 minutes. This is

because, beginning in FY 2021, ETA ceased administering 13 questions on education and training and 4 questions on preventive health. In addition, beginning in the second interview cycle of FY 2022, ETA will cease administering a question to female respondents concerning cervical cancer testing, and a question to all respondents concerning lifetime diagnosis of HIV AIDS. Through pilot testing of the questionnaire that includes the COVID questions with contractor staff, the contractor found that the average time per respondent was 45 minutes.

**Table 4. Change in Burden Hours Associated with the FY 2022 NAWS**

Respondent Type	Respondents per Year		Average Time per Respondent (Minutes)		Total Hours		Change (Hours) FY 2022
	Previous	New	Previous	New	Previous	New	
Crop Workers	1,500	1,500	45	45	1,125	1,125	0
Ineligible Employers	3,672	2,024	5	5	306	169	- 137
Eligible Employers	918	952	12	12	184	190	+ 6
<b>Total</b>	6,090	4,476			1,615	1,484	<b>- 131</b>

**16. For collections of information whose results will be published, outline plans for tabulations, 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.**

There are three NAWS interview cycles per year. The new questions will be administered along with all other NAWS questions in the second and third interview cycles of FY 2022 and in all three cycles of FY 2023. DOL/ETA anticipates that preliminary data will be available by June 2022.

Sampling and post sampling weights are used in the NAWS so that each respondent has a known probability of selection. Weights are normalized and sum to the number of respondents. Farm workers may refuse to be interviewed or may refuse to respond to certain questions. The data are adjusted for non-response.

The data collected under this request will be aggregated, summarized and, where meeting publication requirements, tabulated at the national-level.

All published estimates from the NAWS are available on the NAWS Web site, <https://www.dol.gov/agencies/eta/national-agricultural-workers-survey>.

A detailed description of the statistical procedures used in compiling the data is in Part B.

**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.**

Approval to not display the expiration date for OMB approval is not being sought.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.