**SUPPORTING STATEMENT FOR EXTENSION**

**OF OMB APPROVAL OF**

**THE FOOD SECURITY SUPPLEMENT**

**TO THE CURRENT POPULATION SURVEY**

**(OMB Control # 0536-0043)**

 **January 22, 2022**

**Submitted by:**

U.S. Department of Agriculture

Economic Research Service

 **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 means that households were, at times, unable to acquire adequate food for one or more household members because they had insufficient money and other resources for food. 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 at least some time during the year because they could not afford enough food. The supplement was successfully fielded by the U.S. Census Bureau under the sponsorship of ERS from 1998-2020, and previously, under the sponsorship of the USDA’s Food and Nutrition Service (FNS) from 1995-1997. The survey instrument is included as Attachment A. The content of the questionnaire is similar to previous collections with some minor modifications to update the wording of some questions, and the addition of two new questions as well as two additional new questions that replaced existing questions.

ERS publishes an annual statistical report on the prevalence of 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 CPS Food Security Supplement is sponsored by USDA as a 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 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 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. Annual collections of the CPS Food Security Supplement are fundamental in this monitoring and research effort. The Agriculture Improvement Act of 2018 (2018 Farm Act; <https://www.congress.gov/115/bills/hr2/BILLS-115hr2enr.pdf>) mentions specific efforts and programs that require food security measurement for monitoring and evaluation.

ERS sponsors this data collection and conducts the monitoring and research work in partial fulfillment of its 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: “Provide information to improve the Nation’s nutrition and food safety” (<https://www.ers.usda.gov/media/nhelklzj/economic-research-service-strategic-plan-fy-2021-2025.pdf>).

1. **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 annually 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. Below the proposed CPS-FSS information collection is described briefly and is followed by a discussion of the use of the information received from the current CPS-FSS data collections.

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 that 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 to provide a more complete picture of food security and food insecurity in U.S. households.

The content of the questionnaire proposed for December 2022 includes the same general content as that used in December 2019, 2020, and 2021. The 2022 instrument continues collection of household food expenditures and program participation information, as in previous years, since these factors are major correlates of food insecurity. Minor modifications are proposed for the 2022 questionnaire that reflect terminology updates. The survey questions have been largely unchanged since collection began in 1995. To ensure the continued relevance of the survey questions, ERS contracted with the U.S. Census Bureau to review the 2019 Food Security Supplement (FSS) instrument, develop changes, and conduct cognitive testing of the revised survey instrument. To begin, ERS researchers undertook a review of the survey items in collaboration with research staff at USDA’s FNS and survey methods staff at the Census Bureau’s Center for Behavior Science Methods in the Research and Methodology Directorate. ERS also considered previous comments about the survey received from academic food security experts. Through this review, some wording used in the survey items was perceived to be outdated (for example, questions asking about food spending referred to spending at produce stands but did not ask about spending at farmers markets or online food purchases). Thus, some survey items were updated. Also, based on this review, we included minor modifications to some food security items that are part of the 18-item food security measure, to streamline consistent language across items and reduce burden (for example, consistently using “wasn’t enough money for food” across items in place of “we just couldn’t afford more food”). Some new questions regarding nutrition assistance were added to reflect new and changing Federal and community nutrition assistance programs (for example, a new question asks about receipt of a free or reduced-price meal or snack at an after-school program). In addition, reordering of questions was proposed. The food security items were moved earlier in the survey interview with a possible effect of reducing non-response to the food security items from break-offs part way through the survey. A new questionnaire was developed for testing that incorporated revisions to some of the survey items and a reordering of survey items (Attachment A). The revised questionnaire went through three rounds of cognitive testing led by the U.S. Census Bureau in 2019. The findings and recommendations from the cognitive test are included in the Census report in Attachment J.

In 2020, ERS sought and received OMB approval for a one-time split panel test to assess the revised FSS survey that resulted from the review and cognitive testing process. This split panel test was a separate data collection from the regular annual FSS data collection used to monitor the Nation’s food security. We proposed adding a split panel test because we did not want the test instrument to impact annual food security estimates in such a way that would cause an unnecessary break in the long time series. The data from this one-time split panel test are being used to assess the functioning of the updated questionnaire and the effect of modifying some survey items on key outcomes of interest, like the measure of food security. Our analyses suggest that the minor modifications to the food security items did not affect the food security measure substantially and are unlikely to cause a break in the series, see draft report of analysis of the CPS-FSS 2020 split panel in Attachment K.

Our analyses suggest that other modifications improved the items. For example, Feeding America (a national anti-hunger organization) had previously suggested some revisions to our questions about food received from charitable and community organizations. Those suggested modifications were incorporated into the cognitive testing and the split panel test instrument. The modified questions about receipt of free food and free meals resulted in a somewhat higher prevalence of households reporting receipt from charitable or community food assistance in the test instrument. Anti-hunger organizations had previously provided feedback to ERS that our estimates of food pantry use were likely to be underestimates, so the updated items are believed to better capture participation in those programs.

Based on the results of cognitive testing (Attachment J), and preliminary analyses of the September 2020 split panel test data (Attachment K), ERS is proposing that the test instrument used in September 2020 become the standard CPS-FSS survey instrument beginning with the 2022 data collection (Attachment A). All modifications and updates from the current questionnaire are highlighted yellow in the attached questionnaire. ERS plans to publish a technical bulletin on the 2020 test data that describes the test, the minor modifications to survey items, and the results. This technical bulletin will inform stakeholders about forthcoming modifications to the 2022 survey instrument, and how these modifications may affect estimates from the survey, based on the results of the 2020 split panel test. This split panel test is the most recent example of research ERS has conducted to refine food security measurement. A complete listing of previous technical reports and food security measurement research is available on the ERS website (<https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/survey-tools/#technical>).

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 will continue to include the ERS translation of the Food Security Supplement in the computerized survey instrument, with minor modifications to update terminology. ERS is contracting with Census to update the Spanish-language translation for the draft 2022 survey instrument. The updated Spanish-language version of the instrument will be submitted to OMB for review when it is finalized. Data collection with the revised Spanish-language instrument will not begin until this instrument receives its OMB clearance. 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 2020* (<https://www.ers.usda.gov/publications/pub-details/?pubid=102075>)*,* based on the December 2020 survey, indicated that 89.5 percent of U.S. households were food secure throughout the entire year prior to the survey, while 10.5 percent were food insecure at least some time during the year, including 3.9 percent with very low food security. Among households with children, 14.8 percent were food insecure, including 7.6 percent in which children, along with adults, were food insecure, and 0.8 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 nutrition assistance programs by food-insecure households. ERS also publishes supplementary statistics in the *Statistical Supplement to Household Food Insecurity in the United States* (https://www.ers.usda.gov/publications/pub-details/?pubid=102071). This publication contains critical additional information on topics including food security during the 30 days before the survey, frequency of food-insecure conditions, and use of food pantries and emergency kitchens. In addition to the annual household food security research reports, ERS also publishes charts and graphics on the ERS website that display the findings in formats that can be easily downloaded (see: <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/key-statistics-graphics/> and <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/interactive-charts-and-highlights/>).

Food security statistics based on these data are used by USDA to assess progress toward strategic plan objectives. For example, one of the “Key Performance Measures” 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 “Percentage of American households with consistent, dependable access to food,” i.e. annual food security statistics (See page 60 in, <https://www.usda.gov/sites/default/files/documents/usda-strategic-plan-2018-2022.pdf>).

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 2030 Initiative (<https://health.gov/healthypeople/objectives-and-data/browse-objectives/nutrition-and-healthy-eating>). Household food insecurity has also been identified as a “Leading Health Indicator” and as a social determinant of health for Healthy People 2030. As stated on the Healthy People website: “Leading Health Indicators (LHIs) are a small subset of high-priority Healthy People 2030 objectives selected to drive action toward improving health and well-being.” Continued data collections with the CPS Food Security Supplements are necessary to monitor progress toward the Healthy People objectives for food security. Food security statistics are also 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/americaschildren/eco4.asp>). This annual report highlights the percent of children living in food-insecure households.

The data have been used to study factors affecting households’ food security. For example, recent research studies using CPS Food Security Supplement data have been published as ERS research reports. A 2021 report, *Food Insecurity Among Working-Age Veterans* (<https://www.ers.usda.gov/publications/pub-details/?pubid=101268>), used Food Security Supplement data from 2015-19 to document the extent and severity of food insecurity among working-age veterans. A 2017 report, *Children’s Food Security and USDA Child Nutrition Programs* (<https://www.ers.usda.gov/publications/pub-details/?pubid=84002>), used 2014-15 data to examine the prevalence of food insecurity among children, including by participation in Federal nutrition assistance programs. 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 of the reduction in the real value of SNAP benefits due to inflation in food prices on food spending and the 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.

**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). The American Housing Survey (AHS), sponsored by the Department of Housing and Urban Development, has included the adult food security module. However, these surveys are designed for specific research purposes, and while they are valuable for studying determinants and 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 conducts 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. The AHS also only included the adult food security module. None of these surveys include the full complement of follow-up questions on the 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 monitoring 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 USDA strategic plan objectives, evaluate the effectiveness of USDA nutrition assistance programs, and 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 September 10, 2021 (Volume 86, Number 173, Pages 50694-50695). 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 replies. One comment requested a copy of the survey instrument and draft supporting statements. ERS shared the draft survey instrument and copies of previous supporting statements. The second comment raised questions about measuring nutrition security and asked about cultural bias in the survey. ERS responded and indicated that the food security items form a validated measure of food insecurity and there is not a validated measure of nutrition security currently available for use in the survey. The concepts of nutrition security and economic constrained food insecurity are somewhat distinct. While there may be some overlap in the two concepts, the scientific literature on how these concepts relate is still developing. Even if there were an established methodology in the literature for nutrition security, food security must still be measured and monitored. The long time series of food security data from CPS-FSS enables annual monitoring of trends in food insecurity and research to understand determinants of food insecurity. In response to the query from the Federal Register Notice, we also provided some background research to address the commenters’ concerns regarding cultural bias.

ERS has consulted with several people outside the agency in developing plans for the ongoing CPS-FSS 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. Some concerns from those earlier reviews have been incorporated into this updated instrument. For example, a professor, and user of the CPS-FSS, raised a question previously as to whether responses to the food security items may be influenced by an individual’s responses to the questions about participation in Federal food and nutrition assistance programs that are administered before the food security items in the original instrument. In the 2020 CPS-FSS split panel test instrument and proposed instrument for 2022 we moved the food security items before the questions about Federal food and nutrition assistance in response to this query and also to possibly reduce non-response to the food security items. Also, stakeholders from a national anti-hunger organization had previously provided input on how to ask respondents about use of community nutrition assistance and their suggestions were incorporated in the 2020 test and 2022 proposed instrument.

In developing this updated instrument, ERS research staff consulted and collaborated with multiple staff at USDA’s Food and Nutrition Service and the U.S. Census Bureau and incorporated previous feedback from stakeholders. Contact information for the point person at the Census Bureau who led cognitive testing of the survey items is below:

Kathleen Kephart, Survey Statistician

Center for Behavioral Science Methods

Research and Methodology Directorate

U.S. Census Bureau

Phone: 301-763-8891

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Additionally, in 2021, ERS’s food security measurement methods and findings were reviewed by academic experts Parke Wilde and Irma Arteaga. In addition, they are managing a cooperative research program titled “25 Years of Food Security Measurement: Answered Questions and Further Research.” The purpose of the program is to foster research related to the past 25-plus years of U.S. household food security research and to explore feasible evidence-based improvements looking forward with research findings expected in 2022. Their contact information is below:

 Parke Wilde, Professor

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 Irma Arteaga, Associate Professor

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The questionnaire proposed for this data collection and the burden calculation were also reviewed by:

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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 U.S. 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 U.S. Census Bureau will collect the supplement data in compliance with 13 U.S.C. 182. Each sample household receives an advance letter approximately one week before the start of the initial CPS interview. (See Attachment E) 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.” Respondents also receive a pamphlet titled: “Fact Sheet for the Current Population Survey” (See Attachments F and G). All information given by respondents to U.S. Census Bureau employees is held in strict confidence under 13 U.S.C. 9. Each U.S. 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.**

1. **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 53,901 households will be interviewed each year. These burden estimates assumed the highest possible burden based on recent surveys. The total number of respondents from the recent survey with the largest sample size is used to estimate the total sample size. 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 6,479 hours; an average respondent burden of 7.2 minutes for each of the 53,901 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 (2014-18) and typical reading and response times for the questions. (Note that 2019 CPS-FSS data was not used in these calculations because the number of households in the sample and response rates were lower than in all previous years and could result in lower burden estimates than typically expected. Data from 2020 was not used because CPS response rates were affected by the COVID-19 pandemic, and those data were not publicly available at the time the Federal Register notice was published.)

An estimated 43,121 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 accounts for screening within the supplement and the average proportion of respondent households that answered each section based on their screening status and the presence of children.

An estimated 10,780 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 (2014-18).

About 57 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 food-insecure conditions are screened for administration based on responses to questions about less severe conditions. Based on average responses in the 2014-18 surveys, and the number of new items proposed in the updated questionnaire, lower income or screened in households with children will answer, on average, 35 questions and lower income or screened in households with no child will answer, on average, 26 questions.

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

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **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)** |  53,901  |  1  |  43,121  |  43,121  |  8.8  |  6,299  |  10,780  |  10,780  |  1  |  180  |  **6,479 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) |   |   | 24,418 | 24,418 | 6 | 2,442 |   |   |   |   |   |  |
| 2. Households with children and either lower-income or screened in after food spending questions (average 35 questions) |   |   | 6,430 | 6,430 | 15 | 1,607 |   |   |   |   |   |  |
| 3. Households with no child and either lower-income or screened in after food spending questions (average 26 questions) |   |   | 12,273 | 12,273 | 11 | 2,250 |   |   |   |   |   |  |
| **Total CPS-FSS Respondents** |   |   | 43,121 |   |   | 6,299 |   |   |   |   |   |  |

1. **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 answering the supplement questions is estimated to be $167,547. Cost of respondents’ time is estimated based on the average hourly earnings of production and non-supervisory private-sector employees ($25.86 per hour in July 2021, 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 (6,479 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 U.S. Census Bureau, the Bureau of Labor Statistics, and other Government agencies, if involved. The cost of the December 2021 Food Security Supplement was $710,000. This total cost includes related development costs and public-use data provision costs. This cost is borne by ERS and supported through an interagency transfer to the U.S. 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 2022 supplement is somewhat higher (by 14 hours or 0.21 percent) than that estimated in the previous submission for this supplement (submitted in 2018). 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 total number of respondents from the recent survey with the largest N to estimate the total sample size (53,901 respondents in sample in 2014). The previous submission based the total number of respondents on the average of the two years out of the last five years before that submission 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. 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 2021 CPS Food Security Supplement increased (by $40,000 or about 6 percent) from the previous submission in 2018. This change was due to the increased costs of conducting surveys.

**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 E)

**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.