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

Submitted by:

U.S. Department of Agriculture Economic Research Service

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 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 means that households had access, at all times, to enough food for an active, healthy life for all household members. Food insecurity means that at times during the year, these households were uncertain of having or unable to acquire enough food to meet the needs of all their members because they had insufficient money or other resources for food. Food-insecure households include those with low food security and very low food security. Very low food security is a severe range of food insecurity in which eating patterns of one or more household members were disrupted and their food intake was reduced at times 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 1998-2023 (with fielding planned in December 2024), 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 unchanged from the previous authorization for data collection.

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 U.S. 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 "increase food security through assistance and access to nutritious and affordable food" (objective 4.1; Source: *USDA Strategic Plan, FY 2022-2026*, <u>https://www.usda.gov/sites/default/files/documents/usda-fy-2022-2026-strategic-plan.pdf</u>; see pages 30-31). The Agriculture Improvement Act of 2018, the most recently passed Farm Bill, (2018 Farm Act; <u>https://www.congress.gov/115/bills/hr2/BILLS-115hr2enr.pdf</u>) mentions specific efforts and programs that require food security measurement for monitoring and evaluation.

Food security monitoring to assess progress toward this and other objectives requires that USDA continue basic data collection, analysis, and assessment of data quality. 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.

ERS sponsors this data collection to monitor food security in the overall population and for subpopulations and uses it to conduct research in line with 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 to: "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).

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

The purpose of the CPS Food Security Supplement (CPS-FSS) 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. The proposed CPS-FSS information collection is described briefly below 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 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. The U.S. Census Bureau is currently exploring the addition of an internet self-response option for the Basic CPS, which they are planning to implement by 2027. Supplements, such as the CPS-FSS, will continue to be collected with the option for internet self-response implemented for the CPS-FSS when it becomes available. A sanitized public-use file will be provided by the Census Bureau on its website that can be accessed by Government, academic, and private researchers while restricted-use versions of the supplement will be available through the Standard Application Process (SAP).

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 2025 includes the same content as that used in December 2022, 2023, and 2024. ERS is proposing no change to the CPS-FSS survey instrument (Attachment A).

The CPS Food Security Supplement data have been analyzed and summarized annually since 1995 in statistical reports that monitor the extent and severity of food insecurity in the Nation's households. The most recent ERS report, *Household Food Security in the United States in 2023* (https://www.ers.usda.gov/publications/pub-details/? pubid=109895), based on the December 2023 survey, indicated that 86.5 percent of U.S. households were food secure throughout the entire year prior to the survey, while 13.5 percent were food insecure at least some time during the year, including 5.1 percent with very low food security. Among households with children, 17.9 percent were food insecure, and 1.0 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 Security in the United States in 2023* (https://www.ers.usda.gov/publications/pub-details/?pubid=109895). 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

<u>https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us/</u> <u>interactive-charts-and-highlights/</u>).

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." 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 that provides a

summary of national indicators of child well-being

(https://www.childstats.gov/americaschildren/eco4.asp). The food security statistics included in this report highlight the percent of children living in food-insecure households and monitors changes in that population over time. Continued data collections with the CPS Food Security Supplements are necessary to monitor progress toward the Healthy People objectives and for monitoring subgroups, such as children, at risk for food security.

The CPS Food Security Supplement is the primary data set used to understand the factors affecting households' food security and how USDA's food and nutrition assistance programs impact food security. For example, recent research studies using CPS Food Security Supplement data have been published as ERS research reports. A 2024 report, *Household Food Insecurity Across Race and Ethnicity in the United States, 2016-21* (https://www.ers.usda.gov/publications/pub-details/?pubid=108904), used Food Security Supplement data from 2016-21 to produce detailed food-security statistics by the race and ethnicity of household respondents. 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.

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 multilevel 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.

The CPS-FSS is the primary product for monitoring food security because it is collected regularity, has a sample size large enough to enable analyses of subgroups, and focuses on economic conditions. Other Federal surveys have also adopted measurement of food security to connect this measure of well-being to specific types of surveys or particular populations or outcomes. 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 is only conducted 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.

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.

Data from the December CPS Food Security Supplement (CPS-FSS) is the official source of information on food security statistics for the U.S. population, a key indicator of the economic and material well-being of households utilized by the government,

nongovernmental organizations, researchers and the public to monitor progress towards meeting food security and programmatic goals. The USDA utilizes these data to track progress toward USDA strategic objectives and to evaluate the effectiveness of USDA nutrition assistance programs. The data are important for the conduct of research on economic, demographic, and programmatic factors affecting food security. If these data were not collected, USDA would not be able to continue to monitor food security annually, the research described above could not be completed, and USDA would need to develop or find other means to evaluate the effectiveness of the nutrition assistance programs. Further, nongovernmental organizations, such as those that represent food banks, utilize these data to efficiently allocate resources to meet the food needs of households across the country. If these data were not collected, these nongovernmental organizations would lack national level, high quality information to help assess their needs and objectives to help U.S. households meet the basic food needs. The data are also utilized by academic and other external researchers to study how economic, programmatic, and other factors affect the ability of U.S. households to meet their basic food needs.

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 July 16, 2024 (Volume 89, Number 136, Pages 57844-57845). A copy of the notice is included as Attachment B. One comment was received and is included as Attachment C along with the ERS reply. The comment expressed concerns about the accuracy and reliability of statistics produced using the Current Population Survey and Food Security Supplement. ERS responded and provided a summary of the steps that ERS and the Census Bureau have taken or are currently taking to ensure statistics based on the supplement are relevant, reliable and accurately describe the food expenditure, food security, and nutrition assistance program utilization of the U.S. population.

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.
 - A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for

approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

An estimated 51,937 households will be interviewed each year. These burden estimates assumed the highest possible burden based on estimates from recent surveys. The total number of respondents from the recent surveys (2017-19 and 2021-22) with the largest sample sizes 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 6,559 hours; an average respondent burden of 7.4 minutes for each of the 51,937 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 and typical reading and response times for the questions in the revised survey implemented in 2022. Data from 2020 was not used to determine the sample size because CPS response rates were affected by the onset of the COVID-19 pandemic.

An estimated 41,550 households will complete the Food Security Supplement (respondents). This estimate assumes an 80 percent response rate to the supplement. The average respondent burden is 9.2 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 10,387 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. The sample size represents the maximum number of respondents to the 2017-19 and 2021-22 data collections. Average response times were determined based on respondents' typical responses to the 2022 data collection due to the change in instrument implemented that year and continuing for future data collections.

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; approximately 14 total questions). 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 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 2022 survey, lower income or screened in households with children will answer, on average, 36 questions and lower income or screened in households with no child will answer, on average, 26 questions. The income screener to identify households above or below 185 percent of the poverty line is updated annually in the instrument specification to reflect changes in the poverty thresholds each year (See Attachment A, "POORCK" specification.

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
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours	Hours
CPS-FSS Total Sample (Respondents and Nonrespondents)	51,937	1	41 ,550	41 ,550	9.2	6, 387	10,3 87	10 ,387	1	173	6,559 hours (7.4 minutes per household)
Detailed Burden Estimates by So	creening St	tatus of	Responde	ents:	1			1	1		
1. Higher-income households screened out after food spending questions (average 12 questions)			23,887	23,887	7	2,787					
2. Households with children and either lower-income or screened in after food spending questions (average 35 questions)			5,414	5,414	15	1,354					
3. Households with no child and either lower-income or screened in after food spending questions (average 26 questions)			12,249	12,249	11	2,246					
Total CPS-FSS Respondents			41,550	12,240		6,387					

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

In this supplement, one respondent will answer for the entire household. No cost other than the respondents' time is incurred. The annualized cost of the respondents' time spent answering the supplement questions is estimated to be \$197,229. Cost of respondents' time is estimated based on the average hourly earnings of production and non-supervisory private-sector employees (\$30.07 per hour in June 2024, as estimated by the U.S. Bureau of Labor Statistics; <u>https://data.bls.gov/timeseries/CES0500000008</u>) multiplied by the total response time for all respondents and non-respondents (6,559 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 2024 Food Security Supplement was \$1,058,692. This total cost includes related development costs, public-use data provision costs, as well as a nonresponse bias analysis report on the data. It also includes a one-time cost for Census to study and implement new survey weighting methodology for the food security supplement. 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 2025 supplement is somewhat higher (by 80 hours or 1.2 percent) than that estimated in the previous submission for this supplement (submitted in 2022). The slight adjustment is due to differences in how the burden estimates were calculated and changes in typical respondent behavior to the new instrument (implemented in 2022). When compared to burden calculations for the previous submission, burden calculations for the current submission assume that higher income households screened out and households with no children, on average, responded to two additional questions. In addition, the new burden calculations also assume households with children, on average, responded to one additional question. The calculations also assume an 80 percent response rate (or 20 percent nonresponse), while actual recent response rates have been lower (average supplement response rate for 2017-2019 and 2021-22 is 73 percent). Thus, the assumptions of the burden 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 2024 CPS Food Security Supplement increased (by \$348,692 or about 49 percent) from the previous submission in 2022 for the 2021 data collection. This change was due to the increased costs of conducting surveys and ERS's request for the U.S. Census Bureau to produce annual nonresponse bias reports for the CPS Food Security Supplement as well as to study and implement new survey weighting methodology for the supplement.

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

The December CPS, of which this supplement is a part, will be conducted during the second week of December each year. Processing of the supplement data by the Census Bureau will begin in December, and the edited and de-identified data will be released to ERS in mid-April. Publication of the annual food security report by ERS and release of public-use data files by the Census Bureau are typically scheduled for early September, about nine months after collection of the data, with the exception of years when changes to the survey were made such as the 2022 changes.

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 can certify compliance with all provisions under Item 19 of OMB Form 83-I.