

**Supporting Statement for
National Agricultural Workers Survey
OMB Control No. 1205-0453**

This Information Collection Request (ICR) seeks to revise 1205-0453, National Agricultural Workers Survey (NAWS) by:

- Including H-2A crop workers in the NAWS sample;
- Adding questions on heat-related illness, prevention, and training;
- Adding questions on foodborne illness, prevention, and training;
- Adding questions on precision agriculture;
- Adding a question on controlled environmental agriculture;
- Adding a question on hours worked for wages in the week prior to the interview;
- Reinstating a question on union membership;
- Combining the race and ethnicity questions; and
- Discontinuing supplemental questions on access to healthcare.

Overview of Proposed Questions

The questions on heat-related illness, prevention, and training ask if the respondent:

- was ever told by a doctor or other healthcare worker that they suffered an episode of heat-related illness or heat stress at work and, if so, the number of such cases in the last year
- experienced heat-related illness or heat stress symptoms in the last year while doing farm work and, if so, reported the symptoms to leadership at work
- wanted or needed health care in the last year for heat illness or heat stress symptoms but was unable to access care
- was ever diagnosed with acute or chronic kidney disease
- has access to clean water and drinking vessels every day
- is afforded opportunities to rest, drink water, cool down, and acclimatize when experiencing heat stress symptoms or working in hot conditions
- received heat-related safety training and, if so, the types of safety practices learned and whether the training was in the respondent's preferred language

The questions on foodborne illness, prevention, and training inquire about personal hygiene practices at the work site and ask if the respondent:

- uses food safety precautions when handling crops
- received food safety training within the last year, e.g., how to handle crops for food safety and dispose of contaminants found near crops/nursery plants
- has access to a sanitary, functioning toilet and hand-cleaning station at the job site

The precision agriculture questions ask about the types of technology respondents use at work and whether they received training for the task they are performing when interviewed.

The question on CEA asks if the respondent's primary task on the day of the interview is performed under cover that is designed to improve growing conditions for the associated crop.

The question on hours worked asks if the respondent worked any hours, for wages, in the week prior to the interview, apart from those performed at the current farm job.

The reinstated question on union membership asks if the respondent was covered under a union contract during the last two years while doing farm work in the United States.

Respondents are currently asked separate questions on race and ethnicity. To comply with OMB Statistical Policy Directive No. 15¹, ETA proposes to adopt the combined race and ethnicity question (see Figure 1 below).

Figure 1. Race and Ethnicity Question with Minimum Categories Only and Examples²

What is your race and/or ethnicity?
Select all that apply.

American Indian or Alaska Native
For example, Navajo Nation, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Native Village of Barrow Inupiat Traditional Government, Nome Eskimo Community, Aztec, Maya, etc.

Asian
For example, Chinese, Asian Indian, Filipino, Vietnamese, Korean, Japanese, etc.

Black or African American
For example, African American, Jamaican, Haitian, Nigerian, Ethiopian, Somali, etc.

Hispanic or Latino
For example, Mexican, Puerto Rican, Salvadoran, Cuban, Dominican, Guatemalan, etc.

Middle Eastern or North African
For example, Lebanese, Iranian, Egyptian, Syrian, Iraqi, Israeli, etc.

Native Hawaiian or Pacific Islander
For example, Native Hawaiian, Samoan, Chamorro, Tongan, Fijian, Marshallese, etc.

White
For example, English, German, Irish, Italian, Polish, Scottish, etc.

Questions specific to H-2A crop workers are not proposed in this request. However, response categories to a small number of questions are modified to capture responses likely to be particular to H-2A workers.

Please see Attachment A for the proposed questionnaire.

A. JUSTIFICATION

¹ Office of Information and Regulatory Affairs, Office of Management and Budget, Executive Office of the President. (2024, March 29). *Revisions to OMB's Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity.*

² Ibid.

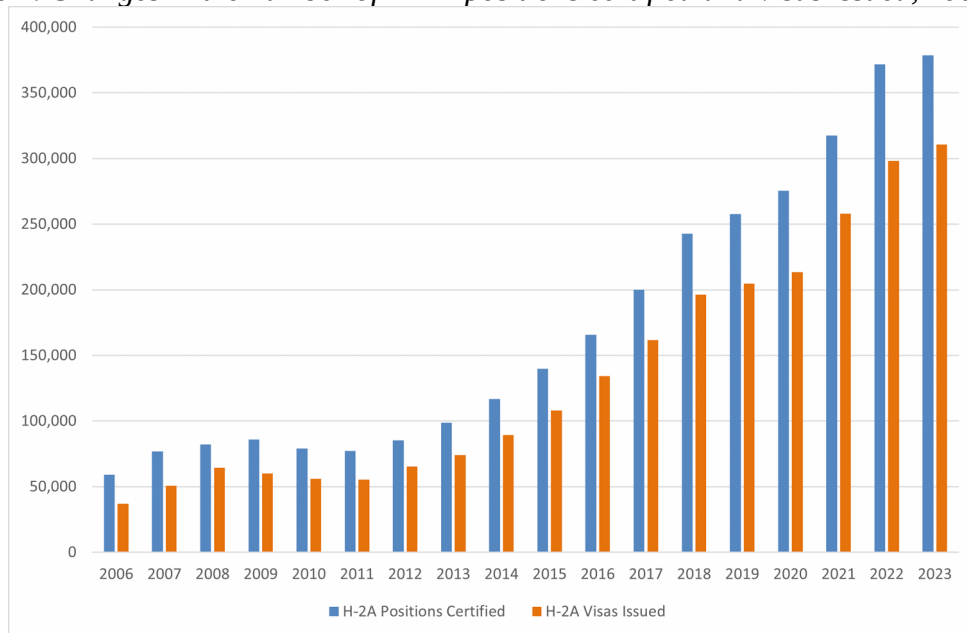
1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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

Including H-2A Crop Workers in the NAWS Sample

Persons employed seasonally in agriculture with an H-2A visa, while not currently interviewed in the NAWS, are an increasing share of hired farm workers. In 2006, the Department of State issued 37,149 H-2A visas, compared to 310,676 in 2023, representing a seven-fold increase over this period (see Figure 2). Today, agricultural workers with an H-2A visa comprise approximately 15 percent of hired farm workers.³

Figure 2. Changes in the number of H-2A positions certified and visas issued, 2006-2023



Sources: 1) Department of State, Non-Immigrant Visas Issued by Classification; 2) Department of Labor, Office of Foreign Labor Certification.

While H-2A labor certification data provide some information on H-2A workers' employment characteristics, there is no national-level information on the demographics of H-2A workers, their use of farm worker programs, their health care access and utilization in the United States, or on other issues important to Federal agencies that administer farm worker programs.⁴

³ Approximately 2.1 million persons, including those with an H-2A visa, are hired for wages at least one day per year on farms and ranches in the United States. Rural Migration News Blog No. 219, May 2021: <https://migration.ucdavis.edu/rmn/blog/post/?id=2603>.

⁴ National Agricultural Workers Survey: H-2A Feasibility Report. (2022). *JBS International*.

Heat-related Illness and Training

In response to growing concerns about the dangers of rising temperatures to the agricultural workforce, the [House Committee on Appropriations, in directives that were incorporated by reference in the FY 2023 omnibus appropriation for Labor, HHS, Education, and Related Agencies \(Report 117-403\)](#), encouraged DOL “to assess heat-related illness and prevention response through the National Agricultural Workers Survey.” Specifically, the Committee recommended that ETA “ensure [farm] workers’ access to drinking vessels, potable water, restrooms, and shade are addressed by the National Agricultural Workers Survey.” The Committee further directed ETA to incorporate questions in the NAWS “about the incidence and prevalence of heat-related illness during agricultural employment and whether [farm] workers have been [trained] on the job about heat-related illness.”

Foodborne Illness. Prevention, and Training

An interagency agreement between the Food and Drug Administration (FDA) and ETA requires ETA to include questions in the NAWS, pending OMB approval, that improve understanding of likely vectors of foodborne illness transmission across the food supply chain. FDA is motivated by the apparent decline in reported rates of foodborne illness following 2020 and aims to use the NAWS to investigate how workplace hygiene capabilities and practices in agricultural settings rank among the hypothesized causes of the observed decline. FDA assessed its internal data sources as well as data from the Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health (CDC/NIOSH), the Occupational Safety and Health Administration, the Food and Beverage Issue Alliance, and the United Food and Commercial Workers International Unions, and found that none of the existing data sources can deliver the necessary insights to elucidate the factors influencing foodborne illness reporting and dynamics.

Precision Agricultural/Digitalization

The U.S. Department of Agriculture’s (USDA) Economic Research Service (ERS) is interested in the extent to which agricultural tasks are being digitalized.

There are two major sets of research questions ERS would like to answer using the collected data. The first set is mainly descriptive:

- What are the trends in use of digital tools among crop workers in the United States?
- How do these trends vary by task, crop, and region?
- Are there certain combinations of technologies that are more common than others, and do these combinations vary by task, crop, and region?
- Do tasks that rely on greater levels of digitalization tend to involve fewer days of work than tasks relying on lower levels of digitalization?

With this information, ERS will have a better understanding of how (and which) tasks are being digitalized. This will complement economic analyses concerned with the digitalization and automation of work and allow ERS to create first-of-its-kind digitalization indices for U.S. farm work that could be used for agricultural productivity or efficiency analyses. Answering this research question could address goals outlined in the 2020 study performed for the Bureau of

Labor Statistic (BLS), [Assessing the Impact of New Technologies on the Labor Market: Key Constructs, Gaps, and Data Collection Strategies for the Bureau of Labor Statistics.](#)⁵

ERS's second question is more technical in nature and more challenging to answer. ERS would like to better understand how greater use of digital technologies, especially to the extent that they boost labor productivity, is impacting U.S. agricultural production. Drawing on literature that estimates task-based production models, ERS aims to use descriptive statistics from NAWS data as parameters for simulations that will shed light on crop worker productivity and aggregate output effects. This will be challenging because ERS observes few production characteristics of the farm on which farm workers are employed. To circumvent this, ERS intends to use assumptions—based on data from USDA's Agricultural Resource Management Survey—about “representative” farms that produce certain crops across regions of the United States.

CEA, Hours Worked, Union Membership, and Race and Ethnicity

The CEA question is necessary to estimate the share of crop workers performing work under cover, which is increasing in response to labor supply constraints, rising input costs, and environmental change. The question is also necessary to distinguish CEA and non-CEA crop workers for comparative analyses of their demographic and employment characteristics.

The question on hours worked in the week prior to the interview is necessary to improve analysis of the effects of overtime provisions and other interventions on the farm labor market. Although the current questionnaire captures hours worked at the current farm job, it does not include a question that captures hours worked during the same reference week at another establishment.

Reinstating the question on union membership during the last two years while doing farm work in the United States is necessary to address increasing requests for information from researchers interested in assessing unionization trends in agriculture and comparing differences in the demographic, employment, and health conditions of crop workers by union coverage.

Combining the current NAWS questions on race and ethnicity is necessary to comply with OMB Statistical Policy Directive No. 15. ETA proposes to adopt the combined race and ethnicity question with minimum categories only and examples, from which the respondent can select all racial identity/ethnicity choices that apply to them. While OMB has offered an alternative question that features minimum categories, multiple detailed checkboxes, and write-in responses with sample groups, the relatively small sample size of the NAWS precludes meaningful disaggregation of data with this level of granularity.

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.

⁵ GALLUP, February 7, 2020.

Including H-2A workers in the sample will increase the survey's representativeness. This, in turn, will allow broader usage of NAWS data. For example, including H-2A crop workers in the NAWS could facilitate analysis of USDA's Farm Labor Stabilization and Protection Program. This expansion will also improve the reliability of the survey's estimates.

ETA will use the information gleaned from the heat-related illness and training questions to directly address the requests made in House Committee Report 117-403.

FDA will use information gathered from the foodborne illness transmission and prevention questions to understand the apparent decline, since 2020, in the transmission of foodborne pathogens relative to crop workers' personal hygiene and food safety practices.

ERS will use information gathered from the questions on precision agriculture to determine how (and which) tasks are being digitalized. This information will complement the growing literature on digitalization in agriculture, the automation of work, tightening agricultural labor supply, and upskilling farm labor. ERS also hopes to use information gathered from these questions to generate a digitalization index, a quantitative measure that can be used to for agricultural productivity or efficiency analyses.

Historical and On-Going Uses of NAWS Data

ETA routinely releases summary reports of the data and data tables on the NAWS Web site: [National Agricultural Workers Survey Research](#). Descriptive summaries of the data reach a wide range of internal and external stakeholders, including scholars, farm employers (and related associations), and nongovernmental farm worker advocacy organizations.

NAWS data are an important source of information on crop worker demographics, employment, and health for Federal agencies that administer migrant and seasonal farm worker programs, including ETA (the National Farmworker Jobs Program (NFJP)), the Administration for Children and Families (Migrant and Seasonal Head Start), the Health Resources and Services Administration (Migrant and Seasonal Agricultural Worker Health), and the Office of Migrant Education (Migrant Education Program). These agencies routinely use NAWS data to understand the characteristics of program participants. ETA routinely uses NAWS and other data to distribute NFJP formulae grants based on each state's share of the NFJP eligible population.

DOL and CDC/NIOSH have produced several NAWS-based publications on occupational injury and mental health. CDC/NIOSH is currently drafting a manuscript summarizing fiscal year 2018-2022 NAWS data on general anxiety disorder. Similarly, ERS routinely draws on NAWS data for farm labor publications and other purposes, including measurements of labor productivity in agriculture. Currently, ERS is using the latest NAWS data on legal status to estimate the number of work-unauthorized crop workers who would qualify to adjust their status to Certified Agricultural Worker under the proposed Farm Workforce Modernization Act.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and

the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

In 2019, ETA required the NAWS contractor to begin testing computer-assisted personal interviewing (CAPI) technology to administer the questionnaire. The contractor now uses CAPI for most interviews, while reserving the paper questionnaire for certain circumstances. For example, the length of an interview, which varies depending on respondent family size and employment history, occasionally makes the paper questionnaire the most efficient medium for meeting interviewing time constraints.

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

As internet and cell coverage are spotty in some rural areas, the 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 system has reduced the time required to locate sampled employers.

Due to the characteristics of the respondent population, in-person interviews remain the optimal form of survey administration.

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 surveys on the demographic, employment, and health characteristics of hired crop workers that would render the NAWS duplicative.

Before it launched the NAWS in 1988, DOL considered USDA's Farm Labor Survey (FLS) to collect information on hired crop workers. 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 administered in-person and establishment based would be appropriate for describing the population of hired crop workers.

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 is no universal list of crop workers from which to directly construct a sampling frame. 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 agricultural employers and crop workers, a stratified sample is used to represent the national population of crop workers. The NAWS contractor minimizes employer burden by trying to determine if they are still in business before contacting them and notifying them ahead of time by mail that they have been selected to participate in the survey. To further minimize burden, crop workers are interviewed, whenever possible, during a break period or before or after the workday. In all cases, employers are informed 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 is necessary to capture outcome heterogeneity resulting from the seasonality of crop employment and, therefore, to minimize bias in NAWS estimates. A representative random sample of employed farm workers can only be obtained by conducting interviews at various times in the year.

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.

ETA consulted widely with stakeholders about including H-2A crop workers in the sample and adding questions to the survey on heat-related illness and foodborne illness. In addition to meeting with subject matter experts (SME), ETA solicited feedback on the proposed changes with stakeholders at agricultural worker health conferences and farm labor seminars. ETA also commissioned a study to assess the feasibility of including H-2A crop workers in the sample. The study included extensive stakeholder engagement on this proposed change.

To develop the questions on precision agriculture, ERS consulted with SMEs at USDA's National Agricultural Statistics Service, the National Institutes of Health, Arizona State University, Cornell University, the University of California at Davis, Michigan State University, Montana State University, and the University of Washington.

As required by the Paperwork Reduction Act of 1995 (44 USC. 3506(c)(2)(A)), ETA published a notice in the Federal Register on 05/10/2024 (89 FR 40507), seeking public comment on the continuation of the survey with the above proposed revisions. Five entities responded to the

notice. The comments and ETA’s responses to them are summarized, below, in Table 1.

ETA also consulted with stakeholders on the proposed inclusion of two new questions (one each) on CEA and hours worked in the week prior to the interview (apart from those associated with the current farm job), and the reinstatement of a question on union membership. However, ETA identified these information needs after the 60-Day notice was published.

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

Public comments on proposed changes	ETA Response
All commenters support including H-2A crop workers in the sample and adding questions to the survey on heat illness, foodborne illness, and precision agriculture. Two commenters suggested changes to the proposed questions.	ETA is grateful for the comments and appreciates the details commenters provided when they recommended changes. Based on the comments, ETA has changed several of the proposed questions, as discussed below.
One commenter noted that the NAWS enables researchers to answer many policy-relevant questions of interest to academics, industry groups, and the government, and encouraged continuation of the survey “as its value to the American public cannot be overstated”.	ETA appreciates this support for the continuation of the survey, with the proposed changes.
One commenter supported the continuation of the survey because its data “are a critical component of any analysis of the farm labor market”, and applauded any changes that improve its scope and coverage.	ETA appreciates this support for the continuation of the survey, with the proposed changes.
One commenter observed that the NAWS serves as unique data source for estimating compensation of migrant agricultural workers, noting that these estimates are important components of U.S. international transactions accounts and gross domestic income. The commenter recommended that the survey continue to facilitate the continuation of compensation estimates.	ETA appreciates knowing how NAWS data are used and will continue engaging with NAWS stakeholders to improve the survey’s utility.
Four comments concerned language access and comprehension. One commenter suggested that the survey be made available in languages other than English, including Spanish and indigenous languages. Relatedly, this commenter suggested adding a question to the language section grid that asks, “How well do you understand this	The questionnaire is administered in-person by bilingual (Spanish/English) interviewers in the preferred language of the respondent, which is usually Spanish. If the respondent’s command of Spanish is insufficient to participate in the interview, the interviewer uses a translator to assist with the interview. Using the NAWS language grid, the interviewer asks about languages the respondent was spoken to as a child and

<p>language?”.</p> <p>One commenter suggested adding a question to the survey that asks about the language in which employer-provided heat-related illness training was given.</p> <p>Lastly, one commenter provided two examples where use of plain language could improve data capture (while observing that plain language is used throughout the survey).</p>	<p>languages the respondent currently speaks. Regarding the latter, follow-up questions ask how well the respondent speaks and reads the language. The self-reported assessments of speaking and reading ability provide a proxy measure for language comprehension.</p> <p>A proposed question on employer-provided heat-related illness training asks if the training was provided in the respondent’s preferred language.</p> <p>ETA appreciates this feedback and will adjust the two questions, per the commenter’s suggestions.</p>
<p>One commenter observed that accommodations may need to be provided to H-2A workers when interviewing them, to ensure they can speak freely and openly with interviewers without fear of retaliation.</p>	<p>Survey procedures ensure that only the interviewer can hear the respondent. However, if it becomes apparent that additional procedures are needed to increase respondents’ privacy and security, ETA will modify procedures to ensure that respondents can speak candidly with interviewers.</p>
<p>One commenter suggested that data collected from H-2A workers be analyzed and reported separately from data on U.S. crop workers, observing that including H-2A workers in the analysis with U.S. workers would not accurately portray the wages and living and working conditions of the latter.</p> <p>Relatedly, to facilitate the separation of H-2A crop workers from non-H-2A crop workers in the data, this commenter suggested adding a question to the survey that asks if the respondent is an H-2A worker.</p> <p>Lastly, this commenter observed that, given the survey’s primary purpose of collecting information on U.S. crop workers, the sample size should be increased to accommodate the inclusion of H-2A workers.</p>	<p>ETA recognizes that, for some purposes, it may be necessary separately analyze H-2A and non-H-2A data. Given the survey’s relatively small sample size, several years of data on H-2A crop workers will be needed to report findings exclusive to them.</p> <p>The cover page of the proposed questionnaire includes a field where the interviewer will record if the respondent is an H-2A worker.</p> <p>ETA recognizes the importance of maintaining an adequate sample size to accommodate the inclusion of H-2A crop workers. In the absence of an increased sample size, and depending on the analysis variable, it may be necessary to pool several years of data to report findings on non-H-2A crop workers only.</p>
<p>One commenter suggested expanding the NAWS sample to include livestock workers and beekeepers, noting that many H-2A</p>	<p>Including non-crop agricultural workers in the NAWS would require substantial funding for an increased sample size and survey redesign.</p>

<p>contracts seek to employ these workers, and there is little information on the circumstances of this workforce.</p> <p>Similarly, one commenter suggested that persons engaged in on-the-farm processing be included in the survey.</p>	<p>Persons who sort, pack, and/or process fruits and vegetables on the farm are eligible to be interviewed if the place where these activities occur is co-located with the sampled farm and at least half the handled product is grown on the sampled farm.</p>
<p>One commenter suggested that the NAWS collect information on heat stress conditions indoors, as well as outdoors, observing that the threats of heat illness are compounded when farmworkers are unable to cool down in overcrowded or substandard housing.</p>	<p>Current NAWS questions are sufficient for determining if the respondent is living in crowded housing at the time of the interview. Depending on resources and accounting for competing information needs and the need to minimize burden, in the future it may be possible to add questions to the NAWS regarding housing conditions.</p>
<p>One commenter suggested adding questions to the survey that focus on measuring the prevalence of employers' water-rest-shade and acclimatization interventions, including whether: 1) the work schedule is adjusted on very hot days to avoid work during the hottest hours; 2) the work pace is slowed on very hot days; 3) a buddy system is used to watch for signs of heat stress in a co-worker; 4) an adequate supply of drinking water is provided during work hours; 5) the water that is provided is cool, and seems clean and pure; 6) individual cups are provided; 7) drinking water is close to the worksite; 8) there is sufficient shade to accommodate all workers during rest breaks; 9) additional break time is provided on very hot days; 10) workers are familiar with acclimatization practices and received training on how acclimatization works; 11) workers are afforded opportunities to adjust their work to heat conditions, or if their exposure to heat is abrupt and intense; and 12) workers experienced heat illness symptoms from not having had time to acclimate to high heat conditions.</p>	<p>Except for asking respondents if heat-illness symptoms were due to not having time to acclimate to high heat conditions, the proposed questionnaire includes the suggested items, either via stem questions or response options.</p>
<p>One commenter suggested adding questions that focus on awareness of and communication about heat-related illness and</p>	<p>ETA is proposing to add questions to the NAWS that are designed to measure both the prevalence and incidence of heat-related</p>

<p>heat stress symptoms, rather than asking about incidents of these outcomes, observing that respondents are likely to be more familiar with symptoms.</p> <p>The recommendations include asking whether the respondent is: 1) aware of acute and chronic heat stress symptoms and can name some of the symptoms; 2) comfortable reporting symptoms to their employer or medical provider; 3) received training on how to safely work in heat and, if so, the language in which they received it; 4) understood the heat illness/heat stress training and was able to ask questions if there were things they didn't understand; 5) can communicate with a co-worker if the they (respondent) experience symptoms; and 6) has ever fainted at work due to heat or seen a co-worker faint at work and require medical attention.</p>	<p>illness/ heat stress, including a question that asks if the respondent experienced any of 18 heat related illness or heat stress symptoms in the past 12 months while doing farm work. The proposed questions, which SMEs in academia, agricultural worker health advocacy organizations, and state and Federal government agencies developed, address most of these recommendations. In most cases, and for the purpose of minimizing burden, the questions inquire about primary but not secondary issues. For example, respondents will be asked if they reported heat-related illness or heat stress symptoms to their employer, but not about their level of comfort reporting symptoms. Similarly, the training questions will ask about topics covered and comprehension, but not whether the respondent was able to ask questions if there were things they didn't understand.</p>
<p>One commenter suggested adding questions about housing amenities and conditions, including whether the respondent has access to toilets/bathing facilities, heaters, air conditioning, potable hot and cold water, cooking facilities, utensils, a working refrigerator, natural light, mail service, internet, telephone, radio, reliable access to transportation to and from the nearest shopping, medical, and cultural facilities, and whether the respondent may receive visitors in their living quarters.</p>	<p>Depending on resources and accounting for competing information needs and the need to minimize burden, in the future it may be possible to add questions to the NAWS regarding housing conditions and amenities.</p> <p>Existing questions D34 and D35b ask about housing type and location, respectively.</p>

<p>One commenter suggested disaggregating the response options to existing question D65, which asks if the respondent is currently</p>	<p>Pilot testing of question D65, which was added to the NAWS in FY 2018, informed that many respondents only knew generally if</p>
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<p>living in a labor camp or migrant center.</p> <p>Specifically, rather than using the response options “labor camp run by a grower or labor contractor” and “labor camp run by migrant center or public agency” the commenter suggested separate response options for each entity.</p> <p>Also concerning question D65, the commenter suggested adding response options “I don’t know”, observing that not all workers know whether their housing is classified as a labor camp or migrant center, and “open range or mobile unit”, observing that many sheep/goat herders may reside in these living arrangements.</p>	<p>the camp was run by a grower/contractor, rather than a migrant center/public agency, i.e., they were unable to distinguish if it was run by a grower vs. a contractor, or a migrant center vs. a public agency.</p> <p>ETA will add the response option “I don’t know” to question D65.</p> <p>Animal agricultural workers are not interviewed in the NAWS.</p> <p>Existing questions D34 and D35b ask about housing type and location, respectively.</p>
<p>Two commenters proposed expanding the foodborne illness questions to inquire about the provision of training on food safety practices; whether kitchens in employer-provided housing have hot water and are provisioned with cleaning supplies; if proper food storage is possible at work and home; and access to and quantity and quality of worksite sanitation resources.</p> <p>Relatedly, one commenter suggested adding foodborne illness questions regarding conditions in the fields: the frequency with which respondents can wash their hands while in the fields; whether respondents have access to toilets and adequately provisioned hand washing facilities in the field; whether the employer provides meals in the fields; and if the respondent has ever gotten sick in the fields and, if so, if they attribute the illness to contaminated food and were able to access medical care.</p>	<p>The FDA and CDC ranked training, workplace hygiene capabilities, and personal hygiene practices as highest among factors impacting foodborne illness occurrence and reporting. As such, while this ICR proposes questions on food safety training, access to and quality of worksite sanitation, and personal hygiene practices, it does not propose questions concerning cooking and cleaning provisions in employer-provided housing or on food storage at work and home.</p>
<p>One commenter suggested expanding the precision agriculture questions to examine ten issues: 1) the prevalence of training and safety</p>	<p>In response to these comments, ETA will add a question to the precision agriculture section that will inquire if the respondent received</p>

<p>programs on new technologies; 2) the degree to which farm workers’ productivity and efficiency is impacted by technology; 3) disparities in proficiency on new technologies amongst farm workers; 4) opportunities for increased pay for workers trained in new technologies; 5) the risk of invasion of privacy in cases where precision agriculture tracks a worker’s location; 6) farm workers’ confidence levels in the use of new technologies and the length of time it took them to feel confident with new technologies; 7) farm workers’ level of comfort or proficiency with technology in general; 8) whether farm workers perceive the use of precision technology as a hindrance to their work or productivity; 9) whether the use of certain technologies is economically burdensome; and 10) whether farm workers incur any costs, e.g., for training or new tools, when new machinery is introduced.</p>	<p>either operational or safety training on the technology they are using/working alongside on the day of the interview.</p> <p>Data from the proposed precision agriculture questions will facilitate wage rate analysis. However, additional questions would be needed to address the other issues this commenter raises.</p> <p>Currently, due to competing information collection needs, coupled with the need to minimize public burden and maintain data quality (which are related), it is not possible to add the questions that would be needed to examine all the suggested issues. However, ETA will retain these suggestions for future consideration.</p>
<p>Two commenters suggested adding questions to the survey regarding workplace and work-related injuries, generally, and about injuries and other health impacts related to the use of new devices and tools.</p> <p>Relatedly, one commenter suggested adding questions to gather information about autonomous technology, including the type used, how it is used, and the types of injuries farm workers experience because of its use.</p>	<p>CDC/NIOSH periodically used the NAWS between 1999 and 2015 to collect occupational injury data. Pending the availability of funding and accounting for competing information needs, questions on occupational injuries and other health impacts related to the use of agricultural technology, including devices, tools, and autonomous equipment, could be included in future administrations of the survey.</p>
<p>One commenter suggested asking respondents if, in the last twelve months, they had contracted Valley Fever.</p>	<p>The soil fungus that causes Valley Fever is found in the Pacific Northwest, California, and the Southwest. As the NAWS is designed to represent crop workers nationally, it may not be an appropriate surveillance tool for this disease. However, if a respondent informs in the health section of the NAWS that they have been diagnosed with Valley Fever, the interviewer will record this information in the ‘other’ response option this section provides.</p>
<p>One commenter suggested asking respondents if, in the last twelve months, they received state disability insurance following an injury</p>	<p>Only five states have state disability insurance (SDI), and the eligibility criteria and benefits vary by state. As such, this question may be</p>

<p>or illness that occurred outside their job.</p>	<p>more suitable for a supplemental questionnaire that is administered to crop workers in states that have SDI.</p>
<p>Two commenters suggested adding questions to the survey on natural disasters, including hurricanes, floods, droughts, and wildfires, noting that data on the impacts of these events on U.S. crop workers “can support policy and program development to mitigate their effects”.</p> <p>Relatedly, one commenter suggested adding 4 questions to the NAWS to inquire if the respondent was ever sent home or had hours of work reduced during the last 12 months due to either air quality, wildfire smoke, extreme heat, or other weather conditions and/or natural disasters. This commenter also suggested adding one question to the NAWS concerning the need to relocate employment or housing because of weather conditions and/or natural disasters.</p>	<p>Academic researchers are currently assessing the utility of the NAWS for examining the effects of natural disasters on crop worker demographic and employment characteristics. This research will inform if adding questions to the NAWS on natural disasters is a good fit for the survey.</p> <p>Currently, due to competing information collection priorities, coupled with the need to minimize public burden and maintain data quality (which are related), it is not possible to add these suggested questions to the survey. However, ETA will retain them for future consideration.</p>
<p>One commenter suggested adding a question to inquire if the respondent has seen posters at their current worksite concerning labor rights and containing the contact information for the relevant enforcement agency.</p>	<p>Although this suggested question seems straight forward, ETA would require time to discuss it with stakeholders and seek public comment on it. As such, it will not be possible to add it to the NAWS at this time.</p>
<p>One commenter pointed out the sensitive nature of the question on legal status (L01) and suggested that “No answer” be added as a response option for respondents who do not wish to answer the question.</p>	<p>ETA has modified the questionnaire to include “Refused” as a response option to L01.</p>
<p>One commenter suggested expanding existing questions on the payment of wages to inquire: 1) about the type of receipt (if one was received); 2) if the receipt showed the amounts and purposes of deductions; 3) if the current or other agricultural employer ever failed to pay the respondent’s wages and; 4) if the respondent ever sought assistance to recuperate lost wages.</p>	<p>ETA would require time to discuss these suggested questions with stakeholders and seek public comment on them. As such, it will not be possible to add them to the NAWS at this time.</p>
<p>One commenter suggested adjusting existing questions on commuting and transportation to ask respondents how often they travel a long</p>	<p>ETA appreciates this commenter’s thorough review of the commuting and transportation questions. ETA will consider adopting the</p>

distance from their current job to their current residence and whether seatbelts are used in employer-provided transportation.	recommendations in future administrations of the survey if there is a strong justification for the proposed additional questions.
This commenter also suggested changing response option 1 in question D37a from “I’m locating at the job” to “I reside at the job.”	This response option has been revised.

ETA consulted with three reviewers (two external and one internal) concerning the burden estimates associated with the proposed changes (see Table 2, below). ETA asked reviewers for feedback on the estimates and estimation methods. One reviewer noted that the estimated number of interviews per farm (see Question 12 below) would potentially be higher due to the inclusion of H-2A workers in the sample. ETA clarified that including H-2A crop workers in the sample will not affect the average number of interviews per farm. As discussed in Part B of the supporting statement, the number of interviews per farm is determined by the number of interviews that have been allocated to the corresponding farm labor area.

All three reviewers indicated that the burden estimate methodology was sound.

Table 2. External and Internal Reviewers of the Burden Estimates

Contact	Organization	Email	Phone
Philip Martin, Professor Emeritus	University of California at Davis	martin@primal.ucdavis.edu	530-304-9186
Zachariah Rutledge, Assistant Professor	Michigan State University	rutled83@msu.edu	517-353-7226
Kyle DeMaria, Data Analyst	Employment and Training Administration, Office of Policy Development and Research	Demaria.kyle.b@dol.gov	202-693-6624

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

ETA offers respondents an honorarium of \$30 prior to the start of the interview to offset the inconvenience and any expense incurred to participate. Research indicates that incentives increase response rates in social research;⁶ monetary incentives have been shown to improve study participation such that even modest compensation results in significant response rate improvement.⁷

⁶ Smith, M.G., Witte, M., Rocha, S. et al. Effectiveness of incentives and follow-up on increasing survey response rates and participation in field studies. BMC Med Res Methodology 19, 230 (2019). <https://doi.org/10.1186/s12874-019-0868-8>

⁷ Abdelazeem B, Abbas KS, Amin MA, El-Shahat NA, Malik B, Kalantary A, Eltobgy M. The effectiveness of incentives for research participation: A systematic review and meta-analysis of randomized controlled trials. PLoS One. 2022 Apr 22;17(4): e0267534. DOI: 10.1371/journal.pone.0267534

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

NAWS interviewers inform respondents of the limitations concerning 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 BLS 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. Crop 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.

None of the proposed questions are necessarily sensitive in nature, but in the cases described below, steps have been taken to minimize threats to the validity of the data collected and to ensure that respondents feel safe when completing the NAWS interview.

- Some of the proposed heat-related illness and foodborne illness questions relate to individual hygiene practice, e.g., handwashing practices after using the bathroom. Many of these questions are adaptations of questions that have been previously asked in the NAWS and have been vetted in previous cycles of survey administration, therefore reducing cause for concern about the potential for unreliable data due to social desirability bias. Further, focus group testing of these questions did not reveal any salient concerns as to whether interviewees would hesitate to answer these questions candidly.
- Some heat and foodborne illness questions ask the respondent about the supports or opportunities their employers offer related to heat and food safety. Conceivably, respondents could fear employer retaliation for relaying perspectives that cast unfavorable light on the employer. These questions, however, are needed to understand personal and workplace practices related to heat-related illness and food safety. Throughout the interview, respondents will be reminded that they are not required to answer any questions and may choose to stop answering questions at any time. Because the data are only reported in

aggregate, it is extremely unlikely that an employer would become aware of unfavorable reporting and, therefore, be motivated to retaliate against the respondent.

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 in Item 14.**

Results

For the three interview cycles of FY 2025, we (ET) estimate 1,280 burden hours at a cost of \$29,750.

Methodology

We generated the estimates shown in Table 3 using the methods described below.

Number of Respondents

Although only hired crop workers (including those who are employed by labor contractors) are interviewed in the NAWS, there are three respondent groups of interest when estimating the survey's burden: eligible employers, ineligible employers, and hired crop workers. NAWS interviewers contact each of these groups to carry out their interview assignments. As such, burden estimates for each are needed.

Employers are farm owners and farm labor contractors, and their surrogates.

From its beginning in FY 1989 until and including FY 2024 employers were eligible if, on the day the NAWS interviewers contacted them, they were employing for wages persons who performed crop work. Crop workers, meanwhile, were eligible if they had not been interviewed

in the NAWS during the previous 12 months, had worked at least one day in the last 15 days, and were not H-2A visa holders.

Beginning in FY 2025 (and pending OMB approval), crop workers with an H-2A visa will be eligible to participate in the NAWS. This departure is important for the burden estimates, as discussed below.

The question for deriving employer estimates is “*How many employers will interviewers need to contact to interview the target sample number of crop workers?*” NAWS interviewers must obtain the employer’s permission to speak with the employer’s crop workers before interviewing the selected workers. The following sampling data are needed to answer this question: target sample size, employer eligibility rate, employer response rate, crop worker response rate, and number of interviews per employer.

We use prior year sampling data to derive the estimates.

In FY 2023, the NAWS contractor sampled 1,657 crop workers and interviewed 1,538 of them, for a ***crop worker response rate*** of 92.8 percent ($\frac{1,538}{1,657}=0.928$). These interviews were obtained on 372 farms (employers), or about 4.1 ***crop worker interviews per farm (employer)***.

Interviewers contacted a total of 2,362 employers and determined that 706 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 29.9 percent ($\frac{706}{2,362}=0.299$).

In FY 2021-2022, three percent of contacted employers were **ineligible** because they informed the interviewing team that they exclusively employed H-2A workers. With the proposed inclusion of H-2A workers in the sample (beginning in FY 2025, pending OMB approval), we anticipate that employer eligibility will increase by approximately three percent⁸. Thus, the ***adjusted employer eligibility rate*** is estimated to be 32.9 percent.

In FY 2023, interviews were conducted at 372 of the eligible employers⁹, for an ***employer response rate*** of 52.7 percent ($\frac{372}{706}=0.527$).

Employer Burden (estimated number of employers to contact)

⁸ The estimated adjustment factor for farms employing only H-2A workers assumes that all the employers in fiscal years 2021-2022 who were ineligible because they only employed H-2A crop workers would have participated if H-2A crop workers were eligible for an interview.

⁹ 402 employers agreed to participate with NAWS survey administration, but interviews only occurred at 372 of these employers’ farms. This discrepancy is explained by some employers agreeing to allow crop workers to be interviewed on a future date, requiring interviewers to return to the farm. If the interviewers reached their allocated number of interviews in the intervening period, completing the delayed interviews was no longer necessary.

Assuming the same number of interviews per farm of 4.1¹⁰, using the adjusted employer eligibility rate of 32.9 percent, and maintaining the employer response rate in FY 2025 of 52.7 percent, interviewers will need to invite 2,094 employers to participate in the survey to interview 1,500 crop workers.

$$\text{Total Employers to Contact} = \text{Target Sample} \div \text{Interviews per Farm} \div \text{Adjusted Employer Eligibility Rate}$$

$$\text{Total Employers to Contact} = 1,500 \text{ crop workers} \div 4.1 \text{ interviews per farm} \div 0.329 \text{ eligible employers per farm}$$

$$\text{Total Employers to Contact} = 2,094$$

Multiplying the estimated number of employers to contact in FY 2025 by the FY 2023 eligibility rate yields the number of employers we expect to contact that are eligible to participate in the NAWS (and its complement, the number of employers who are ineligible to participate). See Table 3 for the final estimates of eligible and ineligible employers.

Employer Burden (average response time)

Time burden for agricultural employers was estimated using historical NAWS survey administration data. The discussion with ineligible employers averages 5 minutes, while the discussion with eligible employers averages 12 minutes.

Crop Worker Burden (average response time)

Average response time was computed using duration data from nine pilot interviews with crop workers of varying household size and employment histories (number of jobs in the previous 12 months) in California, Texas, and New Mexico. Interviewers recruited pilot respondents during their regularly scheduled interview trips. Respondents were selected from crop workers who were sampled but not selected for an interview to ensure that pilot respondents did not already have experience answering questions. Workers interviewed in the pilot survey were given the same \$30 honorarium as regular NAWS respondents. These conditions resulted in pilot interviews that mimicked the regular interview. Interview completion times in this pilot group ranged from 31 minutes to one hour and 15 minutes; the average was approximately 41 minutes (see Table 3). Preliminary data suggest that household and employment characteristics may account for variation in time to complete the survey. However, further testing would be needed to determine if the differences are systematic.

Hourly Wage Rates

Crop worker wage estimates come from USDA's [2023 Farm Labor Report](#)¹¹. Estimated hourly wages for employers were obtained from the BLS' Occupational Employment and Wage Statistics for [11-9013 Farmers, Ranchers, and Other Agricultural Managers](#) (updated as of May

¹⁰ The estimated number of interviews per farm, 4.1, accounts for the worker response rate of 92.8 percent. Including H-2A crop workers in the NAWS sample will not affect the average number of interviews per farm, as the number of interviews per farm is determined by the number of interviews that have been allocated to the corresponding farm labor area (county or group of counties).

¹¹ United States Department of Agriculture, National Agricultural Statistics Service, Farm Labor. November 11, 2023. Hired Workers, Gross Hours Worked by Hired Workers, and Gross Wage Rates – United States. Field Workers. October 8-14, 2023.

2023). Table 3 shows these estimates.

Table 3. Estimated Annualized Respondent Cost and Hour Burden

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	1,500	1	1,500	41	1,025	\$18.24	\$18,696
Point of Contact: Ineligible Employers	1,405	1	1,405	5	117	\$43.35	\$5,072
Point of Contact: Eligible Employers	689	1	689	12	138	\$43.35	\$5,982
Total	3,594		3,594	Varies	1,280	Varies	\$29,750

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should consider 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), 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 2025 is approximately \$4,709,160. This includes base survey costs, including costs associated with proposed changes. The labor category in Table 4, below, pertains to NAWs contractor hours and includes project management, data collection (including travel hours), coding, analysis, and dissemination.

Table 4. Estimated FY 2025 Survey Costs¹²

Category	Base Hours	Base Cost	Additional Hours	Additional Cost	Total Hours	Total Cost
Labor	40,526	\$3,744,853	280	\$25,874	40,806	\$3,770,727
Travel	NA	\$797,642	0	\$0	NA	\$797,642
Other Direct Costs, including G&A	NA	\$140,791	NA	NA	NA	\$140,791
						\$4,709,160

15. Explain the reasons for any program changes or adjustments.

With the proposed changes, there will be a decrease of 204 burden hours. The decrease is spread across crop workers (-100 hours), ineligible employers (-52 hours), and eligible employers (-52 hours). The decrease of 100 hours among crop workers obtains from the reduction in the average time per interview. The decrease of 104 hours among eligible and ineligible employers (52 hours for each group) is attributed to the expansion of the NAWS sample to include respondents and employers who were once ineligible for the survey (i.e., including employers that exclusively employ H-2A workers will decrease the likelihood that NAWS enumerators will contact a farm only to find it ineligible for the survey).

The estimates presented in Table 5 below reflect NAWS FY 2023 employer eligibility and participation rates. The observed increases in employer response rates and the number of interviews per farm from FY 2021 to FY 2023 are likely due to a return to normal operations following the COVID-19 pandemic.

The cost of this burden will decrease by \$473 relative to FY 2021.

The per respondent time burden estimates for crop workers are expected to decrease by approximately 3.5 minutes due to a combination of efficiency gains from computer-assisted survey administration and the discontinuation/condensation of questions that are no longer relevant to stakeholder interests. As NAWS enumerators gain experience with administering the new questions, the average expected duration of the survey is likely to continue to decrease.

¹² Contract costs are based on ETA contract budget files.

Table 5. Change in Burden Hours Associated with the FY 2025 NAWS

Respondent Type	Respondents per Year		Average Time per Respondent		Total Hours		Change (Hours)
	Previous	New	Previous	New	Previous	New	FY 2025
Crop Workers	1,500	1,500	45	41	1,125	1,25	-100
Ineligible Employers	2,024	1,405	5	5	169	117	-52
Eligible Employers	952	689	12	12	190	138	-52
Total	4,476	3,594	-	-	1,484	1,280	-204

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 two interview cycles of FY 2025 and in all three interview cycles of fiscal years 2026 through 2028. ETA anticipates that preliminary data will be available by October 2026.

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 it meets publication requirements, tabulated at the national level.

All published estimates from the NAWS are available on the [National Agricultural Workers Survey website](#).

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.