

Justification for the National Agricultural Workers Survey

Introduction

The objective of the National Agricultural Workers Survey (NAWS) is to provide descriptive statistics of the characteristics of crop workers using a statistical methodology designed to address the difficulties of surveying a mobile and seasonal population often living in non-standard and sometimes hidden housing. In addition, the NAWS is designed to address the information needs of various Federal agencies that oversee farm worker programs. These stakeholders include agencies concerned with occupational injury and health surveillance, Migrant and Seasonal Head Start, and Migrant Health. Another purpose of the NAWS is to produce accurate regional estimates of the share of farm workers who are eligible for training and employment services through the Employment and Training Administration's (ETA) National Farmworker Jobs Program (NFJP).

This document provides background information on the survey. The text presented here is drawn from Part A of the Paperwork Reduction Act (PRA) supporting statement for the NAWS that was submitted to the Office of Management and Budget in July 2015 to justify the survey's continuation. This shortened version of the supporting statement includes relevant information on the purpose and uses of the survey, the projected respondent burden, and an explanation of proposed questions on education and training, health, and digital literacy. The full text of the PRA submission is available at the "Reginfo.gov" website (http://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=201506-1205-006).

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.**

Collection of information on the U.S. hired farm labor force is necessary to monitor the terms and conditions of agricultural employment and to evaluate the human resources that are vital components of the nation's thriving agricultural sector.

NAWS data are essential for understanding changes in and estimating the sizes of populations eligible for assistance via farm worker and farm worker-related programs. The Federal Government currently allocates approximately \$1 billion per year to such programs, including those administered by the Department of Health and Human Services (HHS) (Migrant Health and Migrant Head Start), the Department of Education (ED) (Migrant

Education) and DOL (National Farmworker Jobs Program). As the only national information source on the employment, demographic, and health characteristics of hired crop workers, NAWS data are central for informing these programs. The Wagner-Peyser Act, as amended (29 USC 49f (d) and 49l -2(a)), authorizes DOL to collect this information. (ETA will receive funding from various sources to support its collection of this information.)

The survey will add additional questions on participation in education and training programs that are important because research shows that participation in some types of adult education is associated with increased earnings and more weeks of employment. However, few studies have examined how adult education programs targeting migrant and seasonal farm workers (MSFW) affect labor market outcomes in this population (Alves Pena, 2011). This is partly due to the lack of available analysis data. The current NAWS questions on education and training programs are broad and cannot be used to isolate the effects of participation in particular types of education and training, the duration of participation in such programs, or whether the individual completed and achieved a credential or a license from their participation in the program. The proposed questions will fill this gap.

The questions will provide the data necessary to examine the effects of participation in adult education programs, including programs funded by the National Farmworker Jobs Program (NFJP). The NFJP, which was recently reauthorized under the Workforce Investment and Opportunity Act, helps MSFWs develop skills that can be used in complementary occupations during agricultural off-seasons to increase their economic stability.

The proposed questions on digital literacy will provide valuable information on an important cross-agency federal digital initiative, described in the *National Broadband Plan*. This plan envisions universal access to and use of broadband internet technologies in a variety of domains including health care, education, and commerce. The NAWS digital literacy supplement will provide key information about the evolving picture of broadband access and digital literacy in the United States for the population of MSFWs and their families.

The proposed questions are parallel to ones used in other national and international surveys such as the Program for International Assessment of Adult Competencies (PIAAC), the Current Population Survey (October Supplement on Education and Internet Use), the Pew Survey on Health Tracking and Internet Use, and the Federal Communications Commission Consumer Survey of Broadband Use and Adoption. These other surveys, however, do not provide adequate coverage of the MSFW population. The proposed digital literacy questions will thus add important coverage of this population.

The information on digital literacy will depict the distribution of broadband and information technology access in the migrant and seasonal farm worker population. This information will support the development of technology-based products and services that can reach and assist these workers and their families in areas of safety, education and training, health care, housing, and employment.

The proposed questions on quality and access to health care will cover routine, preventive and dental care for farm workers, spouses and children. In addition, the questions on farm

workers' health history will provide data to measure the prevalence of heart disease, asthma, cancer, high blood pressure, cholesterol, diabetes, AIDS, and other illnesses. This information on quality and access to health care in general, but in particular the expanded questions to capture information about spouses and children, is important because it will improve the Health Resources and Services Administration's (HRSA) ability to understand the barriers farm workers and their families face in accessing comprehensive, affordable, and culturally and linguistically effective health care services.

As mentioned above, the NAWS collects information on several health conditions. The proposed questions on Generalized Anxiety Disorder (GAD) are needed to improve understanding of farm worker mental health. Available evidence suggests that poor mental health is common among farm workers. Previously identified environmental stressors confronted by farm workers include restricted social mobility, discrimination, dangerous working conditions, financial uncertainties, language difficulties, and concerns related to documentation. Annual surveys of occupation-related injuries, illnesses and fatalities of workers in agriculture regularly indicate agricultural occupations are among the most stressful and hazardous. Acculturative stress and separation from family or family conflict put farm workers at even greater risk of mental health problems. Farm workers may be more likely to experience anxiety than workers in other occupations. They often work without adequate sleep and hurry to undertake field work, particularly during planting and harvesting seasons.

The core GAD symptom is chronic, excessive and uncontrolled worry. GAD is frequently associated with other psychiatric disorders. The effects of GAD on health-related quality of life have been reported to be even greater than observed in major depressive disorder, which is known to be disabling and costly. One scale that has been developed and validated for early detection or screening of probable GAD cases with excellent psychometric properties is the GAD-2, which we propose to use in the NAWS. It is easy to administer and its shortness allows it to be used in epidemiologic studies and also in remote health surveys along with other health questionnaires. The scale has been culturally adapted and is available in Spanish. The 2-item generalized anxiety disorder scale (GAD-2) can be scored between 0 (never) and 6 (almost every day). The overall score can range between 0 and 6 and can be used to assign farm workers to the following severity levels (0-2) minimal, and severe (3-6). Using a cut-off value of ≥ 3 , a sensitivity = 0.86, specificity = 0.83, and Cronbach's alpha = 0.927 have been reported.

- 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 NAWS is a multi-agency funded effort and designing the questionnaire is a collaborative undertaking, involving several federal agencies that directly use the results. In addition to ETA, these have included the EPA, ED, and several institutes and administrations within HHS. Representatives of these and other agencies regularly meet to discuss program-specific uses of NAWS data.

The proposed questions on education and training programs will be very useful to NFJP and a range of federal agencies for planning education and training program delivery to MSFWs and their dependents. In particular, the data will permit ETA and NFJP to measure the extent to which farm workers participate in adult education programs, including an assessment of whether the individual completed the program. Furthermore, the data will inform analyses to measure the effects of participating in NFJP-funded programs. In this proposed analysis, researchers will apply propensity score matching using NAWS respondents who are NFJP-eligible but who have not participated in any kind of training as the comparison group to measure the impact of adult education and training on income, agricultural employment and complementary employment outside of agriculture.

Cross-agency programs will also benefit from using this information. Researchers in a wide variety of fields will utilize data about participation, duration and education attainment in the NAWS population in support of a range of topics including farm worker employment stability, both in agriculture and complementary occupations, income and earnings, and utilization of federally-funded education programs among MSFWs and their dependents.

The information on digital literacy will be very useful to a range of federal and state agencies for planning service delivery to MSFWs and their families. Efficient delivery and coordination of services increasingly depend on broad consumer access to and use of information technologies in such domains as safety, health care, education and training, social services and employment. Cross-agency initiatives and programs will also benefit from using this information about MSFWs. Researchers in a wide variety of fields will utilize data about technology access and use in the NAWS population in support of a range of topics including farm worker safety and health issues, education, training and employment issues, and utilization of various services by the farm worker population.

The information on digital literacy will be used in a variety of ways. Agencies and researchers will use the data to depict technology access and utilization in the target population, and compare it with other populations of interest in terms of location, economic and educational background. More in-depth studies will explore the intersection of technology and digital literacy with other data within the NAWS, cross tabulating the supplemental information with health and health care indicators, region/crop-specific training and safety information, and so forth. The information could also be useful for planning in-depth assessments of digital literacy skills in future NAWS cycles. Such assessments will be quite feasible given the new assessment tools being made available through PIAAC. Such a future assessment, made possible by the supplemental information collected in this cycle, could support the design and implementation of effective digital literacy training for using broadband internet technologies in a range of domains such as health care, safety and education.

Information on quality and access to health care among farm workers, their spouses, and children will be very useful for HRSA to undertake outreach focused on expanding farm worker access to comprehensive, affordable, and culturally and linguistically effective health services. An expansion in access to health has implications for health care utilization as

previous research shows that having health insurance makes medical care more affordable and accessible.

The information on quality and access to health care may be used in several ways. The information will assist HRSA with the development of a more robust, data-based response for addressing stakeholder concerns about the lack of health insurance among migrant children and the quality of health care these children receive. The information on health access for children and spouses can improve HRSA's ability to remove barriers to accessing care, as well as improve the quality of care received. Key stakeholders focused on health access and the quality of health for migrant children and their families have repeatedly commented on the lack of health insurance for migrant children and their families. HRSA, stakeholder advocates and researchers can use the data to describe and study health insurance coverage and access to medical care for migrant children and their families, and to make recommendations regarding health care screening and delivery. In addition, this information can be examined along with other information collected in the NAWS to identify specific risk factors, such as children in mixed status families, which may need to be targeted for intervention/prevention efforts. Having more specific information on health insurance, preventive care and access to medical services, and especially making available national prevalence data, will provide important bench marking data that will allow for regional and other comparisons. These data also have the potential to identify groups experiencing barriers to health care access and for whom expansion of access to quality care is needed.

The information on GAD among farm workers will be very useful to a range of federal, state, and local agencies involved in occupational health and to community and migrant health centers in particular. Rural health care providers are likely to confront problems of poor mental health among farm workers. Research has shown that GAD affects mental health functioning and health-related quality of life. There is also some evidence of an association between poor mental health and increased risk of occupational injury. This impact will be felt, not only for the farm worker, but the family as well. Those agencies or services dealing with children of these farm workers will also find this information useful. Outreach focused on protecting farm worker mental health has implications not only for mental health service delivery, but also for health care utilization in general as previous research has found that poor mental health is associated with increased levels of health care utilization.

The information gathered on GAD may be used in several ways. Researchers in multiple disciplines (e.g., occupational health, psychology, sociology, anthropology, and medicine) can use the data to describe and study the occupational health of this vulnerable population, and make recommendations regarding health care screening and delivery. In addition, this information can be examined along with other information collected in the NAWS to identify specific risk factors for poor mental health that should be targeted for intervention/prevention efforts. Having more specific information on the mental and physical health of these workers, especially making available national prevalence data, will provide important bench marking data that will allow for regional and other smaller group comparisons, providing the potential to identify and intervene in groups experiencing elevated risks.

Current and previous collections of NAWS data have been widely used. Examples include:

- Since 1999, ETA has used NAWS data in its formula for allocating farm worker employment and job training funds across states under Section 167 of the Workforce Investment Act.
- In January 2015, the Legal Services Corporation (LSC), a quasi-governmental agency, utilized NAWS data in a new formula for estimating the number and geographic distribution of agricultural workers who are eligible for LSC-funded legal services.
- ED's Office of Migrant Education periodically utilizes NAWS findings to better understand the needs and characteristics of the population served in its various programs.
- Since 2008, the Administration for Children and Families (ACF) has been using NAWS data to meet a congressional mandate to collect data on the barriers that farm workers face participating in the Migrant and Seasonal Head Start (MSHS) program. ACF also uses the data to estimate the number and distribution of the MSHS-eligible population.
- EPA has used NAWS data to determine the languages in which Worker Protection Standards pesticide safety instructions should be provided. In addition, data on the number of days per month that workers are exposed to pesticides has informed exposure models, and data on the number of days worked in various crops is being assessed for use in cancer risk assessment models. Preliminary data on the number of hours per day farm workers are potentially exposed to pesticides, from the 2013-2014 EPA questions, is undergoing initial analysis.
- In preparation for both the 2000 and the 2010 Decennial Censuses, The Bureau of the Census used NAWS findings on farm worker household characteristics and living arrangements to inform its approach to locating and administering the Census questionnaire to MSFWs, a historically undercounted population.
- The United States Department of Agriculture's (USDA) Economic Research Service has been using NAWS data on demographic and employment characteristics to quantity- and quality- adjust the number of farm workers in its agricultural productivity models.
- The Bureau of Economic Analysis has been using NAWS data in its international transactions account estimates, which are part of Gross Domestic Product.
- The Congressional Budget Office (CBO) has used NAWS data to estimate the economic impacts of immigration legislation. In FY 2013, the CBO used NAWS data to score S.744, "The Border Security, Economic Opportunity, and Immigration Modernization Act." NAWS data made it possible to estimate of the number of farm workers that would qualify for earned legalization and the numbers and locations of their spouses and children. Similarly, NAWS data assisted the CBO in scoring H.R. 1773 "The Agricultural Guestworker Act" by providing estimates of the number of unauthorized crop workers

that would qualify for an H-2C visa and simultaneously be eligible for adjustment of status under the Deferred Action for Childhood Arrivals executive order.

- The NAWS was similarly useful in FY 2006 for assessing immigration legislation. CBO relied on NAWS data to estimate the number of unauthorized farm workers who would qualify for legalization under Section 613 (a) “The Blue Card Program” of Senate Amendment 3192 to the “Securing America’s Border Act” (S.2454). CBO used the resulting findings and other NAWS data to project the costs of the legislation. Similarly, the Congressional Research Service used NAWS data in FY 2006 to estimate the share of newly legalized farm workers who would leave the farm labor market upon obtaining legal status.
 - In FY 2004, HHS utilized NAWS health insurance data to fulfill its obligations under Section 404 of Public Law 107-251, “The Health Care Safety Net Amendments of 2002.” Section 404 required DHHS to report to Congress on the problems experienced by migrant and seasonal farm workers in obtaining health services from the State-administered Medicaid and State Child Health Insurance Programs. In FY 2002, HHS, Bureau of Primary Health Care used NAWS findings to construct MSFW enumeration profiles for ten states.
 - While U.S. federal government agencies primarily use NAWS data for programmatic purposes, they also use the survey’s data to exemplify the U.S. government’s fulfillment of responsibilities under international agreements. In FY 2000, the Department of State utilized NAWS findings at the Best Practices for Migrant Workers conference, which was held in preparation for the spring 2001 Summit of Americas. DOL’s Bureau of International Labor Affairs has used NAWS findings at each of the last four U.S.-hosted government-to-government meetings with Mexico regarding the labor rights of Mexican migrant farm workers. These meetings are part of the dispute resolution process under the North American Agreement on Labor Cooperation (NAALC), the labor side-bar agreement to the North American Free Trade Agreement. In 2002, the Commission for Labor Cooperation, which was established under the NAALC, made extensive use of NAWS data in its report “Legal Background Paper on Migrants in North America.”
 - Several Presidential Commissions have used NAWS findings for program evaluation purposes. These include the Commission on Migrant Education, the Commission on Agricultural Workers, and the Commission on Immigration Reform. Moreover, the NAWS provides timely information to Congress on agricultural labor and child labor issues. The Government Accountability Office has utilized NAWS data in its reports to Congress about information gaps on the immigrant population and DOL made extensive use of NAWS findings in its December 2000 report to Congress “The Agricultural Labor Market - Status and Recommendations.”
- 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.

The use of information technology to reduce respondent burden is currently inappropriate for this survey due to the very low literacy levels among farm workers. All interviews are conducted in-person and the interviewer writes down respondent answers directly on the questionnaire. The proposed questions will be inserted into the primary questionnaire.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

There are no reliable national estimates of the employment, demographic, and health characteristics of hired crop workers that would render the NAWS duplicative. Moreover, there are no existing data sources that would provide reliable estimates of the quality and access to health care, access to digital information sources, and participation in education and training of farm workers. The primary NAWS questionnaire has collected information on health care access, and includes some questions on participation in education and training.

Prior to the NAWS, information on farm workers was collected via a supplement to the Current Population Survey (CPS). The CPS, however, excludes large numbers of employed crop workers from its sample, particularly the foreign-born and migrant workers. Many of these workers are difficult to find because they do not live at recognized addresses for long periods of time. USDA's Farm Labor Survey (FLS) was also considered. The FLS collects wage and other employment data at the national and regional level. It is conducted with employers and personnel managers, however, and cannot be used to describe the characteristics of hired crop workers.

In addition to considering other surveys, DOL also investigated the possibility of using existing data sets to evaluate the characteristics of workers in U.S. crop agriculture. Unfortunately, data recorded by social security numbers in the Unemployment Insurance (ES 202) files, as well as files of the Social Security Administration, do not provide the appropriate employment, demographic, and health characteristics. DOL determined that only a survey that was both personally administered and establishment-based (workers are sampled at their place of employment) would be appropriate for describing the population of hired crop workers. The NAWS is the only survey that satisfies these requirements.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Agricultural employers of all sizes are selected in the NAWS by simple random sampling. It is necessary to sample employers first as there are no universe lists of farm workers. The farm 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 the purpose of creating the worker frame.

To reduce burden on both agricultural employers and farm workers, a stratified sample is used to represent the national population of farm workers. The NAWS contractor minimizes the burden of this activity on all employers, including small employers, by trying to determine if the employer is still in business before contacting the business and by notifying the employer ahead of time by mail that they have been selected to participate. To further minimize burden, farm workers are interviewed, whenever possible, outside the workplace, and during a break period, lunch, or before or after the workday. In all cases, interviewers are instructed, and employers are informed ahead of time, that the interview process is not to interfere with the employer's production activities. This information collection does not have significant economic impact on small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The NAWS is conducted yearly in three cycles to ensure sensitivity to seasonal fluctuations in labor across the country. Staggered sampling cannot be avoided due to the seasonality of crop employment. A representative random sample of employed farm workers can only be obtained by conducting interviews at various times in the year. The seasonality of crop employment and the mobility of workers require seasonal sampling in order to avoid bias.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.

This information collection is consistent with 5 CFR 1320.5.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

As required by the Paperwork Reduction Act of 1995 (44 USC. 3506(c)(2)(A)), ETA published a notice in the Federal Register on 06/26/2015 (80 FR 36853), seeking public comment on the proposed changes. ETA received four sets of comments (letters) in response to this notice. Each letter expressed support for the continuation of the NAWS. In one letter, the commenter asked that it be notified if changes to the questionnaire will impact its ability to generate estimates of the number of international migrant farm workers and their incomes, which are needed to annually update international transaction accounts and gross domestic product. ETA assures that none of the proposed changes will affect this commenter's ability to produce these economic figures. Three of the letters offered suggestions for: retaining and/or modifying existing questions; adding new questions; and modifying questions that ETA has proposed.

9. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

DOL consults with many outside agencies regarding the availability of information on the demographic, employment, and health characteristics of farm workers, including the Departments of Agriculture, Health and Human Services, Homeland Security, and Education, the Bureau of the Census, the Bureau of Economic Analysis, and the EPA. These departments and agencies support the NAWS as a means of complementing other data available to them. Indirect but useful data about farm workers are available from USDA, which conducts the Census of Agriculture and the FLS. None of the USDA or FLS data, however, overlap with NAWS data.

In the last year, ETA has also consulted with NIOSH, health experts at NIOSH-funded agricultural health and safety centers, HRSA, and HRSA and ETA grantees about the NAWS questionnaire and the survey's findings. In addition, ETA and the NAWS contractor have presented survey findings and overviews of proposed questionnaire changes to the entities from whom the information is collected. Various presentations were made with agricultural employer and farm labor contractor associations, as well at events where farm workers and farm worker advocates were present. Valuable feedback on the NAWS was provided from stakeholders at these presentations.

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

Farm workers will be compensated \$20 for their time responding to the survey to offset the inconvenience and any expense incurred to participate (e.g., child care). NAWS interviewers provide the incentive just prior to the start of the interview. There will be no additional incentive payment to respondents for answering the proposed new questions. Research indicates that incentives increase response rates in social research (Ryu, Cooper, & Marans, 2006). According to the National Science Foundation, monetary incentives improve study participation and offset the costs of follow-up and recruitment of non-respondents (Zhang, 2010).

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

The survey collects information on wages and working conditions, legal status, occupational health, and recruitment practices. The workers are informed that their information will be kept private to the extent possible under the law to help them overcome any resistance to discussing these issues. The workers are also informed of the purposes of the information collection as well as the safeguards to protect their privacy.

Respondents are also informed of the limitations concerning the privacy assurance. Specifically, they are informed 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 confidence and will not release them.

Interviewers are sworn to protect the privacy of both agricultural employers and farm worker respondents. To protect the identity of agricultural employers, only the direct-hire employees of the contractor who have been made agents of the Bureau of Labor Statistics and who have sworn to abide by the privacy safeguards may have access to the names and addresses of employers and may only use this information for the purpose of locating hired crop workers. Workers are interviewed alone to protect their privacy. Additionally, farm worker respondents will be protected by ETA's System of Records for the NAWS, which was established under the Privacy Act (5 USC 552a). At the conclusion of the survey, all records of the names and addresses will be destroyed.

12. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Of the proposed questions, those on health are likely to be the most sensitive. Based on responses to similar questions in previous administrations of the survey, however, it is evident that the privacy assurances, as well as the rapport that develops between the interviewer and respondent, make them less intrusive. Federal agencies with mandates concerning the health status of farm workers need the additional information that will be made available by the new health questions to plan, implement and evaluate their programs effectively. Farm workers respond well to all the health questions and the data obtained is of high quality. Information will be analyzed in aggregate form and individual health histories will not be available to researchers. The privacy of the respondents will be guaranteed.

13. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Burden hour calculations are shown below. On average, it will take 60 minutes to administer this questionnaire. This estimate is based on: 1) the contractor's experience estimating burden changes during its 26 years administering the NAWS; 2) mock interviews with contractor staff, including interviewers; and 3) pilot testing in three parts of the country with farm workers who were gathered for focus group (cognitive) testing of the questionnaire. The estimated average time is comparable to the average time required in previous administrations of the NAWS after accounting for differences in questionnaire content.

While all respondents will answer the primary questions, only those who have children under the age of six will answer the seven ACF-sponsored questions on child care services. Based on recent administrations of the questionnaire, it is estimated that approximately 20 percent of the 3,369 respondents will have children under the age of six.

Taking into consideration all family types, the average time per worker respondent is 60 minutes.

In addition, as an establishment survey, employers are contacted to gain permission to sample their workers. In FY 2014, 2,823 workers were interviewed on 583 farms, or about 4.8 workers per farm. A total of 3,149 farms were contacted and 1,207 of them were determined to be eligible for participation, meaning that farm workers were employed there when interviewers arrived to speak with the employer, for a farm eligibility rate of 38 percent (1,207/3,149 = 38%). Interviews were conducted at 583 of the eligible farms, for a response rate of 48 percent (583/1,207 = 48%). Assuming the establishment eligibility rate and response rate will be at least 38 percent and 48 percent, respectively, then approximately 3,847 establishments will need to be approached and invited to participate in order to interview 3,369 farm workers on approximately 702 farms in FY 2016 (target sample size ÷ interviews per farm ÷ eligibility rate ÷ response rate = total establishments to contact):

$$3,369 \text{ interviews} \div 4.8 \text{ interviews per farm} \div .38 \div .48 = 3,847 \text{ establishments to contact}$$

The discussion with ineligible employers lasts, on average, five minutes, while the discussion with eligible employers can be from ten to 14 minutes, depending on the number of questions the eligible employer has about the survey. The average discussion time with eligible employers is approximately 12 minutes.

Table 1. Estimated Burden Hours Associated with the FY 2016 NAWS

Who will be interviewed/contacted?	Survey Instrument	Respondents per Year	Average Time per Respondent	Total Hours
Farm workers	Primary questionnaire, with proposed changes	3,369	60 minutes	3,369
Farm workers with children under age six	Child care questions*	674*	6 minutes	67
Ineligible employers	Point of contact only	2,385	5 minutes	199
Eligible employers	Point of contact only	1,462	12 minutes	292
Total	All respondents and contacts	7,216	Not estimated	3,927

* Not included in total respondents; they are a subset of the primary questionnaire respondents.

Source: These estimates are based on previous administrations of the NAWS. Survey background information is available on the “NAWS website”

http://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=201506-1205-006.

14. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

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

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

There will be an increase of 528 burden hours most of which is associated with changes to farm worker and employer sample size. The increase of 369 farm worker respondents, which results in an increase of 369 hours, is necessary for reporting point estimates on key demographic and employment characteristics at the desired level of precision, taking into account the survey's statistical design.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The most recent dissemination of NAWS data was the July 2014 release of the 1989-2012 public access data file, which replaced the 1989-2009 file. The July 2014 release included a set of 22 tables, charts, and text summaries, including results for all of the NAWS health data from 1999-2010, grouped by two-year intervals. A restricted use data set is also available to researchers needing information not in the public access data. Additional findings, including regional summaries of data, have been presented at various stakeholder forums. Recent forums include the HRSA-sponsored Migrant Stream Forums, the Migrant Education and Identification and Recruitment conference, and the ETA-sponsored conference of Region 6 (West Coast) Monitor Advocates and NFJP grantees. The presentation slides from these forums are distributed to attendees and posted for other interested stakeholders and researchers. The NAWS contractor produces national level reports. The next report, which will summarize data that was collected in fiscal years 2011-2012, is under review at ETA for publication later this year.

The proposed questions will be part of the FY 2016-2018 data collection and included in the national report that will be produced in FY 2018. The data will be added to the NAWS 1989-2018 public access data file. It is anticipated that researchers will use this data to compare to PIAAC data and other national and international data on broadband access. Health policy researchers will access either the public or restricted data to develop models explaining health behavior. HRSA and ETA will conduct additional analyses to meet the needs of their programs and grantees.

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 OMB Clearance Number and Expiration Date are published on the main NAWS questionnaire in the upper left-hand corner.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions” (5 CFR 1320.9).

This item is not applicable to this information collection because no exceptions are sought.

REFERENCES

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

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