Supporting Statement – Part A

EQUINE SURVEYS

OMB No. 0535-0227

A. JUSTIFICATION

This docket is being submitted to request extension of approval to conduct reimbursable State equine surveys.

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 National Agricultural Statistics Service's primary function is to prepare and issue current official State and national estimates of crop and livestock production, disposition, and prices. Auxiliary services such as statistical consultation, data collection, summary tabulation, and analysis are performed for other Federal and State agencies on a reimbursable basis as the need arises. Each year, several individual State Departments of Agriculture ask NASS to conduct equine surveys in their States. Equine surveys have previously been conducted in fifteen States where equine is a significant portion of their agriculture.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204 (Attachment A). This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collection of statistics ... and shall distribute them among agriculturalists."

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.

Survey results are being used to provide an assessment of the equine industry's contribution to a State's economy in terms of infrastructure and value. The surveys will address (a) equine inventories, by category; (b) equine revenue, by activity; and c) equine-related expenditures, by purpose. In addition to providing information for the specific States, these surveys will provide NASS with names and addresses of equine operations that can be used for Census of Agriculture enumeration and for the NASS program, which seeks to cover 99 percent of U.S. agricultural cash receipts.

Within USDA, the Animal Plant Health Inspection Service (APHIS) is responsible for monitoring and coordinating the response to outbreaks of infectious diseases of livestock. Many of these diseases are transmittable to other livestock species and humans. The ability of APHIS to effectively meet its charge with regard to infectious diseases of equine can be hindered by lack of equine demographics. NASS has an ongoing cooperative agreement with APHIS and data collected in these surveys helps to maintain a database.

There are discussions underway to conduct a national survey in 2009, which would benefit from the list-building done in these States.

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.

Web-based data reporting has been implemented for NASS information collections. This reimbursable program, however, consists of one-time only mail surveys so the additional development of a web-based instrument would not be practical.

4. Describe efforts to identify duplication.

NASS cooperates with State Departments of Agriculture and Land Grant Universities to conduct agricultural surveys. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agriculture industry. There is no duplication of questions asked of producers in this docket. In addition, respondent lists are carefully compared to ensure there is no overlap. Breed associations, equine veterinarians, and selected University personnel are contacted to ensure that information is not already available from other sources.

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

The data collection instrument is constructed to minimize respondent burden as much as possible. Much of the information requested can be provided with a minimum of difficulty by the respondents and generally with only minor reference to record books or tax records.

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 equine survey in each State is a one-time only survey or on a multiple-year cycle, such as every 5 or 10 years.

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;...

There are no special circumstances associated with this information collection.

8. 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.

The Notice for these surveys was published in the Federal Register on October 3, 2006 on pages 58369-58370. One comment was received from the public, which did not require a response. An employee from the Department of Energy requested a copy of the questionnaire to examine the layout, wording, and labeling to help him design his own instruments.

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.

All known sources such as breed associations, veterinarians, university personnel, extension agents, and APHIS are asked for information and evaluation of the questionnaire and the survey in general.

9. Explain any decision to provide any payment or gift to respondents.

There are no payments or gifts to respondents.

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

Questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 (Attachment B) provide for the confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture must read the regulations and sign a statement of compliance. (Privacy Impact Statement is in Attachment C.)

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

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.

The estimated completion times below are based on the number and length of questions and similarity of survey instruments to previous equine surveys. Sample sizes include pre-test counts.

Estimated Annual Equine Survey Response Burden Hours									
State Size	Frame	Sample Size	Response			Non-response			Total
			Estimated Responses	Min/ Resp	Burden Hours	Estimated Count	Min/ Non-res	Burden Hours	Burden Hours
Larger State (e.g., CO, TN)	List	75,000	60,000	30	30,000	15,000	2	500	30,500
	Area	500	500	10	84				84
	Total	75,500	60,500						30,584
	- .	2-000	22.000	2.0					
Medium State (e.g., NJ, SC)	List	35,000	,	30	14,000	· ·	2	234	,
	Area	200		10	34				34
	Total	35,200	28,200						14,268
Smaller State (e.g., DE, MO)	List	3,000	2,400	30	1,200	600	2	20	1,220
	Aron	50	50	10	9				9
	Total	3,050	2,450						1,229
Annual average burden for one									
large, one medium, and one small survey per year		113,750	91,150		45,327	22,600		754	46,081

Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting data. Reporting time of 46,081 hours are multiplied by \$22 per hour, for a total cost to the public of \$1,013,782.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There is no cost burden to respondents.

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal Government for an equine survey ranges from \$43,000 to \$324,000, with an average of approximately \$100,000; costs are fully reimbursed by the States involved. Approximately 85 percent of the cost is personnel cost for data

collection and analysis; non-personnel costs are for printing, postage, and computer processing.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden). The new burden hour figure for this renewal is 46,081 hours, 22,718 hours more than the current inventory of 23,363 hours. The indicated increase in hours reflects an increase in the number of States conducting equine surveys (program change).
- 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.

Data collection usually occurs in January and February, a less busy time of year for farm and ranch operators and before NASS's regular crop and livestock surveys begin. Keying and editing of the data will be conducted by the NASS Field Office (FO) in each State. The FO will summarize individual reports to aggregate levels and provide the results to the respective State Departments of Agriculture as publications, some in full color. Most publications are now also made available on the Internet from the individual State office's Website; for example, New York's 2000 and 2005 publications are available at

www.-nass.usda.gov/Statistics_by_State/New_York/Publications/Special_Surveys/ index.asp.

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.

There is no request for approval of non-display of the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

There are no exceptions to the certification statement.

October 2006