

## Supporting Statement

### **FIELD CROPS OBJECTIVE YIELD SURVEYS**

OMB No. 0535-0088

This docket is being submitted for revision and extension of three years.

#### **A. JUSTIFICATION**

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

The primary function of the National Agricultural Statistics Service (NASS) is to prepare and issue current official State and national estimates of crop and livestock production, disposition, and prices. General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204 which 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 agriculturists."

Data from this information collection provides yield estimates for corn, cotton, potatoes, soybeans, and wheat. The Objective Yield (OY) Survey provides unbiased input by utilizing plant counts and other measurements during the growing season. Accurate yield estimates are extremely important because they are used in conjunction with price data to estimate production and value which are used in making policy decisions in all agricultural sectors. Data is collected in major producing States for corn, upland cotton, fall potatoes, soybeans, winter wheat, durum wheat, and other spring wheat. Major producing States are States that when combined, produce over 80 percent of the commodity.

- 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 U.S. Department of Agriculture uses the production forecasts to anticipate loan receipts and pricing of loan stocks for grains. The Congress takes into account changing yield and production levels in formulating farm legislation. Farmers and businesses use the production estimates in marketing decisions to evaluate expected prices and to determine when to sell.

These production forecasts are greatly relied upon by the transportation sector, warehouse and storage companies, banks and other lending institutions, commodity traders, and processors. Those in agribusiness who provide farmers with inputs, equipment, and other goods and services study reports when planning their marketing strategies. Analysts transform the statistics into

projections of trends, interpretations of economic implications, and evaluations of alternative courses of action for producers, agribusinesses, and policy makers.

- 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 is currently being used by NASS for some information collections. Collections have been prioritized for conversion based on their frequency, complexity, and market sensitivity. The objective yield surveys, however, are composed of enumerator field interviews and field and laboratory counts and measurements and are not good candidates for web-based reporting.

Field-level planted acreage information for the crop of interest (as reported on the base Agricultural Survey, OMB No. 0535-0213) is preprinted on the Form A - Interview Form. Respondents are asked to verify the information and report harvesting intentions. This greatly reduces the amount of time respondents must spend during the initial interview for corn, cotton, soybeans, and durum and other spring wheat crops.

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

The National Agricultural Statistics Service cooperates with other Federal agencies, State Departments of Agriculture, and land grant universities to conduct agricultural surveys and ensure that identical data are not being collected by other parties. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. The types of data collected on this survey are not available from any other source.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

Operators of sampled fields will be contacted only on the first visit to verify planted acreage reported on the parent survey; record harvest acreage intentions; and obtain data on planting date, planter row width, seeding practices, irrigation usage, and application of pesticides. The farmer will be asked for permission to enter the sample field and make counts and measurements. The work with this survey is done with trained enumerators and the information requested can usually be provided with a minimum of difficulty and generally without having to consult their record books.

- 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 interview is needed to receive permission to do field work. Response burden is not effected by frequency of field work since no further interviews are conducted. Objective yield counts begin as soon as meaningful counts can be made and continue each month until the field is harvested. The field work needs to be conducted each month to keep abreast of changes in maturity during the growing season.

**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.**

There are no special circumstances associated with this survey.

**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 soliciting comments was published in the Federal Register on Feb. 26, 2008, on page 10220. One public comment that did not require a response is attached.

**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.**

NASS consults with both government and private organizations to determine better methods to accurately predict crop yields. NASS Field Offices and Headquarters personnel frequently meet with other governmental agencies such as Agricultural Marketing Service and World Agricultural Outlook Board, as well as extension agents, cooperatives, and trade associations. Statisticians also keep in touch with private agricultural groups by attending their meetings whenever possible. Data user meetings are held each year as part of the effort by the NASS to obtain input from a cross-section of agricultural interests.

**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 confidential. U.S. Code Title 18, Section 1905 and Title 7, Section 2276 provide confidentiality for 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. The Privacy Impact Assessment is attached.

**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. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

A description of the forms used in this docket is included in Item 16 below. Only form A for each crop creates a respondent burden; a letter with the burden statement is given to the operator at the first visit; a copy of the letter is attached. Forms B, C, E, Q, and R are used to record counts and measurements made by enumerators in the field or laboratory and are included only to provide a complete picture of the objective yield program.

The following table shows expected annual response burden.

2008 Projected Response Burden for Objective Yield Surveys - Form A (Initial Interviews)												
Crop	QID	Sample Size	Freq	Responses				Non-response				Total Burden Hours
				Resp. Count*	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours	
Com	120032 A	2,100	1	1,960	1,960	20	653	140	140	2	5	658
Cotton	120033 A-1	1,250	1	1,160	1,160	20	387	90	90	2	3	390
Potatoes	120038 A	1,400	1	1,200	1,200	30	600	200	200	2	7	607
Soybeans	120034 A	1,950	1	1,870	1,870	20	623	80	80	2	3	626
Wheat	120031 A-1W	1,450	1	1,300	1,300	30	650	150	150	2	5	655
Wheat	120031 A-2D	150	1	130	130	20	43	20	20	2	1	44
Other Spring Wheat	120031 A-2S	400	1	370	370	20	123	30	30	2	1	124
Totals		8,700		7,990	7,990		3,080	710	710		24	3,104

\* Adjusted for duplication due to selection of more than one sample per field.

Cost to the public of providing information for the initial and post-harvest interviews is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 3,104 hours is multiplied by \$24 per hour for a total cost to the public of \$74,496.

**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, and any other expense that would not have been incurred without this collection of information.**

The total federal cost for 2007 was \$3.8 million: direct Federal costs of approximately \$1,100,000 and Federal reimbursement of State Field Office field enumerator costs of approximately \$2,700,000. State costs are approximately \$1,224,000 for mileage, telephone, printing, and other miscellaneous costs; the remainder was personnel costs.

- 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 total burden of 3,104 hours is an increase of 46 hours from the previous submission. This was an overall result of CA being dropped from the cotton Objective Yield sample and the remainder of the sample sizes were rounded off to reflect an average annual sample size for the next three years.

- 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 following table summarizes the purpose and timing of each form used in collecting objective yield data.

<b>Survey Forms for All Crops</b>		
<b>Form</b>	<b>Timing</b>	<b>Purpose</b>
A	Initial visit	Interview to obtain acreage information; permission to enter the sample field and make counts and measurements; cropping practice information including planting date, planter row width, seeding practices, irrigation use, and application of pesticides.
B	Monthly	To record field observations and counts.
C-1	When sample arrives in regional lab.	To record lab counts and weights.
C-2	When sample arrives in regional lab.	Record lab determination for final pre-harvest visit.
E	Just after sample field is harvested.	To record harvest loss information.
Q-1	Monthly	For supervisors to record quality check counts.

The Objective Yield Survey field work begins April 25 for winter wheat and July 25 for all other crops. Survey results are tabulated the first week of the following month and used to set that month's yield forecast.

Sample fields for objective yield surveys are selected from acreage reported on the June Agricultural Survey (OMB No. 0535-0213). For corn, cotton, soybeans, and durum and other spring wheat the June Agricultural Survey reported acres are adjusted to an estimate of acres for harvest by computing a ratio of acres for harvest in the tract as reported on the OY survey to total acres planted in the tract. The direct expansion estimate from the June Agricultural Survey is then multiplied by the ratio for an indication of acres for harvest.

For winter wheat, sample fields are selected from acreage for harvest reported on the March Agricultural Survey (also OMB No. 0535-0213). Acres for harvest as grain are adjusted by computing a ratio of acres for harvest on the sampled farm at the time of the initial objective yield interview compared to those same acres reported in March.

To reduce the sampling error for potatoes, sample fields are selected from acreage reported on the June Agricultural Survey Program (OMB No. 0535-0213). Planted acres are adjusted to acres for harvest by computing a ratio of acres for harvest on the sampled farm at the time of the initial objective yield interview compared with planted acres reported in June.

Averages from sample counts, measurements, and weights are correlated with final pre-harvest plot yields to forecast yield. These indications are used as an independent indication which the aggregate of the objective yield State estimates must total. At the State level, objective yield indications are used in conjunction with the monthly (probability) Agricultural Yield Surveys (OMB No. 0535-0213).

Monthly production estimates during the growing season are published in the Agency's *Crop Production* release (<http://usda.mannlib.cornell.edu/reports/nassr/field/pcp-bb/>) which is issued between the 8<sup>th</sup> and 12<sup>th</sup> of the month. End-of-season estimates are issued in mid-January in the *Annual Summary of Crop Production* (<http://usda.mannlib.cornell.edu/reports/nassr/field/pcp-bban/>).

- 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.