

Supporting Statement

2009-2010 CENSUS OF AGRICULTURE CONTENT TEST

OMB No. 0535-0243

A. JUSTIFICATION

This submission is for the Census of Agriculture Content Test which is conducted every 5 years prior to the full Census of Agriculture. The last content test was done in 2005 in preparation for the 2007 Census of Agriculture. We are planning multiple phases to this test, including cognitive testing and two mailout tests. The cognitive testing is needed to determine the proper wording needed to improve the likelihood of better response from the targeted sample in mailout tests of content, as well as the consistent reporting of data from across the country.

- 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 purpose of this content test is to evaluate factors impacting the National Agricultural Statistics Service's Census of Agriculture program. Such factors include, but are not limited to, response burden, questionnaire format and design, and question wording. The proposed forms and letters will be used in a test in 2010 and 2011 in preparation for taking the 2012 Census of Agriculture. The full census is required by law under the "Census of Agriculture Act of 1997," Pub. L. No. 105-113 (7 U.S.C. 2204g). It is the primary source of detailed State and county data that provide benchmark information for the agricultural sector. Testing is needed to measure the respondent's ability to comprehend the questions as worded and provide the intended data before introducing the full census. The most significant changes are expected to be wording changes and some reordering of questions to address reporting problems discovered in the 2007 census.

- 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 census content test is conducted prior to the census of agriculture. It is designed to evaluate a number of factors affecting the census program, such as report form format and design, new content items, changes to question wording, respondent burden, attitudes affecting response, selected processing procedural changes, improved usage of screening questions to improve the flow of the

questionnaire (resulting in reduced respondent burden and improved data quality), and changes in respondent reporting which may lead to misclassification of a farm (i.e., farms reporting as non-farms and non-farms reporting as farms). NASS will analyze the results of the test to identify modifications to incorporate into the final design of the 2012 Census of Agriculture data collection tools and processing methodologies.

- 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.**

There is no technology that will eliminate the need for census content testing. Web-based or electronic data reporting is an option for all NASS information collections for which it is practical. The mail out content test will have an online version available for completion via the Internet.

- 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.**

Data and evaluative information obtained from the content test are not available elsewhere.

- 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.**

Although the actual census of agriculture is required by law, all phases of this test collection are voluntary. Every effort will be made to minimize burden. NASS is requesting earlier approval so we have time to test multiple versions on a small volume basis with focus groups, cognitive interviews, and panels before the actual test of content. The test will include testing of both a paper form and an online web-based form. The flexibility of a web-based form will allow operations reporting on line to skip sections of the form which do not apply to them.

When we get to the final version test, the sample will be drawn mostly from active, in-scope list records but will necessarily include a small number of out-of-scope units to ensure that changes will not convert non-farms to farms simply by how they respond. The test sample will be representative of the farming population. It will include all sizes of operations along with all types (livestock, crops, full and part time farmers, etc.). To the extent possible operations

targeted for regular NASS surveys will be excluded from the content test. Respondents will be permitted to use estimates if records are not available, or precise figures unknown. A toll-free telephone help line will be available to aid in reporting.

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 census of agriculture is required by law every five years; the content test is conducted 2-3 years before the full census. Elimination of this testing would ensure that reporting problems already identified would remain in future administrations of the Census of Agriculture. Less frequent content test collections would hinder the agency's ability to adequately evaluate changes and reduce the scope of changes considered necessary to improve census data collection and therefore recognize changing trends in agriculture.

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;...

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 soliciting comments on this information collection was published in the Federal Register on May 4, 2009 on pages 20450 – 20451. No public comments were received.

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 held meetings with data users and contacted Federal and State agencies that use census statistics to discuss data needs and ask for recommendations and justifications on content for the 2012 census. The proposed census content was designed on the basis of recommendations received from Federal Government agencies; State departments of agriculture, land-grant universities

and colleges, other State agencies, and agricultural organizations; and the Advisory Committee on Agriculture Statistics. Members of the public were also invited to make recommendations for census content through an on-line submission form accessible on the NASS public website. The Advisory Committee on Agriculture Statistics is an important contact with data users outside the Federal Government. It meets on a regular basis and makes recommendations regarding all areas of the Agency's agricultural statistics program, with a special focus on the census. The committee advises the agency on current and future data needs, the ability (or willingness) of respondents to supply the desired information, general data collection methods, content and format of census and survey report forms, and publicity. The advisory committee evaluates requests from users as to priority and respondent burden.

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

We plan to give the cognitive phase respondents their choice of a solar, hand-held calculator or a tape-measure as a "Thank You" gift, since the respondents are being asked to do considerably more than the typical respondents. The former has a value of about four dollars while the latter is valued just over two dollars. There are no payments or gifts to respondents for the final test.

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

All questionnaires include a statement that individual reports are kept confidential. The specific Census of Agriculture citation, Title 7 U.S. Code Section 2204g, plus Title 18 Section 1905, Title 7 Section 2276, and Subtitle A of the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA) 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 (NASDA) must read the regulations and sign a statement of compliance.

NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, CIPSEA, (Public Law 107-347). CIPSEA supports NASS' pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents; subject to the limitations and penalties described in CIPSEA.

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

The questions on race and ethnicity on the report form comply with the OMB Standards for the Classification of Federal Data on Race and Ethnicity. The

question on total household income of the principal operator is a collapse of the strata breaks used on the OMB approved Agriculture Resource Management Survey, OMB Control #0535-0218.

- 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 table below shows estimates of the amount of time needed to complete the report forms based on results from the last Census of Agriculture Content Test. Estimates of the non-farm response are based on re-contacts made during the 2007 Census of Agriculture.

Reporting time of 21,588 hours is multiplied by estimated \$24 per hour for a total cost to the public of \$518,112.

Projected Response Burden Hours for Census Content Testing											
	Sample Size	Freq.	Response				Non-response				Total Burden Hours
			Count	Freq. x Count	Min/ Resp.	Burden Hours	Count	Freq. x Count	Min./ Non Resp	Burden Hours	
Phase I - Cognitive Testing											
Round 1	150	1	120	120	60	120	30	30	2	1	121
Round 2	150	1	120	120	120	240	30	30	2	1	241
Round 3	150	1	120	120	120	240	30	30	2	1	241
Sub-Total	450		360			600	90			3	603
Phase II - Initial Mail Test											
Mailed Out	5,000	1	3,000	3,000	50	2,500	1,450	1,450	2	48	2,548
Completed by incoming phone call **		1	50	50	5	4	0	0	2	0	4
Non-farm Screen out (completed)		1	500	500	10	83	0	0	2	0	83
Personal re-interview	200	1	180	180	20	60	20	20	2	1	61
Phase III - Final Mail Test											
Mailed Out	30,000	1	18,600	18,600	50	15,500	9,000	9,000	2	300	15,800
Completed by incoming phone call **		1	900	900	5	75	0	0	2	0	75
Non-farm Screen out (completed)		1	1,500	1,500	10	250	0	0	2	0	250
Publicity Materials*											
	35,000	1	19,950	19,950	5	1,662	15,050	15,050	2	502	2,164
Total	35,450		24,910	24,910		20,734	10,540	10,540		854	21,588
* Publicity Materials are sent out with Phases II & III and contain instructions for reporting data on the internet.											
** Incoming telephone calls, from respondents to calling centers with 800 toll-free numbers.											

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost 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.**

Total content test costs are estimated at \$ 2.5 million. These costs are included in the 2012 Census of Agriculture appropriations for fiscal year 2008 and the planned budgetary request for fiscal year 2009 and 2010.

- 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).**

Since the Census of Agriculture Content Test information collection is a reinstatement, there is no current inventory of burden hours. The previous collection, however, had 30,450 respondents, 19,050 total responses, and 14,496 burden hours, compared to the current request of 35,450 respondents, 24,910 responses, and 21,588 burden hours. The sample size was increased to allow for two mail out tests to ensure greater reliability of test results. The increase in burden is also associated with the inclusion of burden for the publicity materials and a projected increase in positive responses.

- 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 results of the tests are not intended for general publication but rather will result in summary and research reports for internal use only. The material will be evaluated as to methods to improve data collection methods, question wording, etc.

Timetable for the 2009-2010 Census of Agriculture Content Test

Planning and Development	March 2009 – Dec 2009
Small Scale Cognitive Testing.....	Dec 2009 – Dec 2010
First Mailout Test.....	Dec 2009 - Mar 2010
Evaluate First Mailout Test.....	Apr 2010 – Sep 2010
Second Mailout Test.....	Dec 2010 – Mar 2011
Evaluate Second Mailout Test.....	Apr 2011 – May 2011
Finalize Report Forms.....	May 2011 - Sep 2011

- 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.

August, 2009