

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 (NASS) primary function is to prepare and issue State and national estimates of crop and livestock production, disposition, and prices, as well as specialty agricultural and environmental statistics. Crop and livestock statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations. Modern agriculture increasingly calls upon NASS to supply reliable, timely, and detailed information in its commodity estimation program.

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. 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 the 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.

Currently there are five Field Offices that have been negotiating with their State cooperators to conduct an equine survey during the next three years, if funding can be secured.

- 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 economically feasible at this time.

- 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. The list of farm operations that have equine is derived primarily from the data collected on the Census of Agriculture (0535-0226); conducted by NASS every five years.

- 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 inconsistent with the general information guidelines in 5 CFR 1320.5.**

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 Federal Register Notice soliciting comments for these surveys was published in the Federal Register on July 27, 2010 on page 43915. One comment was received from the public.

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 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

Additionally, NASS and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (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.**

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.**

Total burden hours based on the average completion time per questionnaire are summarized below. The combined reporting for all surveys of 23,744 hours is multiplied

by \$24 per hour, for a total cost to the public of \$569,856. Sample sizes include pre-test counts.

Estimated Annual Burden for Equine Surveys - 2011 - 2013											
Survey State	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	
Large Equine State (TX)	71,000	0.33	56,800	18,744	20	6,248	14,200	4,686	2	156	6,404
Medium Equine State(s)	30,000	1	24,000	24,000	20	8,000	6,000	6,000	2	200	8,200
Smaller Equine State(s)	5,000	1	4,000	4,000	20	1,333	1,000	1,000	2	33	1,367
Pre-survey letter	106,000	1	84,800	84,800	5	7,067	21,200	21,200	2	707	7,773
Total 1/			84,800	46,744		22,648	21,200	11,686		1,096	23,744

1/ Totals may not add due to rounding.

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

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.

The total annual cost to the Federal Government for an equine survey is zero dollars. The average costs to conduct an equine survey in a State ranges from \$50,000 to \$350,000, 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 23,744 hours, 22,337 hours less than the current inventory of 46,081 hours. The indicated decrease in hours is the result of three primary factors. First, only one State (Texas) currently qualifies as a large Equine State. If Texas is selected to conduct a survey, they will only be conducting the survey once during the next three year approval cycle. Second, using previous survey results, we have corrected the average survey completion time from 30 minutes to 20 minutes. Finally, we have removed the counting of respondents for an area frame which was not used during

the previous three year approval. These changes are an adjustment in the Agency Estimate. There are no Program Changes at this time.

- 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 conducting the survey. Questionnaires will vary from State to State, depending on type and use (farm work, pleasure, transportation, racing, etc.) of the equine in that 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 2005 publication is available at:

http://www.nass.usda.gov/Statistics_by_State/New_York/Publications/Special_Surveys/Equine2005/Equine%202005.pdf

Delaware's 2004 publication is available at:

<http://dda.delaware.gov/pressrel/2EquineSurveyFULL.pdf>

Indiana's 2002 publications are available at:

http://www.nass.usda.gov/Statistics_by_State/Indiana/Equine_Summary/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.**

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.

September 2010