

SUPPORTING STATEMENT FOR INFORMATION COLLECTION

Part A

UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)

ANIMAL AND PLANT HEALTH INSPECTION SERVICE (APHIS)

VETERINARY SERVICES (VS)

CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),

NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)

Small –Scale Livestock Operations Study

**SUPPORTING STATEMENT FOR INFORMATION COLLECTION BY THE
CENTERS FOR EPIDEMIOLOGY AND ANIMAL HEALTH (CEAH),
NATIONAL ANIMAL HEALTH MONITORING SYSTEM (NAHMS)¹
OMB NUMBER 0579-XXXX
SMALL-SCALE LIVESTOCK OPERATIONS STUDY**

October 2010

A. JUSTIFICATION

This submission is a request for approval to initiate the National Animal Health Monitoring System's (NAHMS) Small-Scale Livestock Operations study, an information collection by the Animal and Plant Health Inspection Service (APHIS). A small-scale farm is defined by the USDA as a farm with annual sales less than \$250,000. Historically, NAHMS studies have focused on individual commodity groups and have provided information by various operation size groups based upon the specific commodity of interest. These data collection efforts thus did not encompass a broader look at the enterprise including existence of other animal species raised on the operation.

This study is designed to collect information on operations with total annual sales between \$10,000 and \$250,000². Based on expert input, farms with annual sales from \$250,000 to \$499,999 were also of interest and were included in the study. This data collection will focus primarily on small-scale operations that have mixed livestock operations (more than one species or commodity). Producers have a chance of selection in every State in the United States. The study questionnaire will be administered via mail with a telephone followup interview for those who do not respond. The collection will support the following objectives:

1. Provide a description of animal health, marketing, and management practices on small-scale operations.
2. Identify challenges faced by small-scale operations; and
3. Describe management and biosecurity practices important for the control of infectious diseases on small-scale operations.

The information collected through the Small-Scale Livestock Operations study will be analyzed and organized into descriptive reports. Several information sheets will be derived from this report and will be disseminated by APHIS to the producers, stakeholders, academia, veterinarians, and any other interested parties. The potential benefit to the industry from the Small-Scale Livestock Operations study is a scientifically valid national estimate of management practices of the nation's small farm industry, and an understanding of what challenges are faced by small farms. Participation in this

¹ The National Animal Health Monitoring System is responsible for collecting national data on animal health and productivity from voluntary participants.

² Calculated gross value of annual agricultural products sold via the NASS list frame in 2010.

survey is voluntary; it is up to the individual producer to decide whether or not it is desirable to participate.

1. Explain why the collection of this information is necessary.

The NAHMS Small-Scale Livestock Operations study will support the USDA Strategic Plan for FY 2010-2015. The study will collect information supporting Strategic Goal 1: Assist Rural Communities to Create Prosperity So They are Self-Sustaining, Re-populating, and Economically Thriving.

Two specific examples follow:

1. The study will support Objective 1.1.

Objective 1.1 – Enhance Rural Prosperity

Pillar 3 – Develop and Support Regional Food Systems

“An increased emphasis on regional food systems will have direct and significant benefits to rural communities. Increased economic activity in food-related sectors of the economy help communities build and maintain prosperity. Building on the foundation established in the 2008 Farm Bill, USDA will work closely with all its strategic partners – Federal, tribal, State, county, local, community, and private sector – to develop and revitalize the critical infrastructure necessary for vibrant regional food systems. This includes supporting innovative new opportunities as well as proven business approaches like cooperatives. Farmers markets continue to provide an important distribution channel for direct-to-consumer sales. Regional food hubs will also play a role in enabling regional food systems to serve traditional and institutional customers.

USDA continues to support the planning, coordination, and education necessary for thriving regional food systems, and the recognition and replication of successful models.” (excerpt from page 2 of Strategic Plan for 2010-2015, <http://www.ocfo.usda.gov/usdasp/sp2010/sp2010.pdf>)

The Small-Scale Livestock Operations study will collect data on the availability of infrastructure and the use of various business approaches such as cooperatives and farmer’s markets. This information will help policy makers plan and coordinate efforts to develop regional food systems, recognize successful business models, and identify educational needs.

2. The study will support Objective 1.3.

Support a Sustainable and Competitive Agricultural System.

“The economic vitality and quality of life in rural America and the U.S. economy at large depends on a financially healthy agricultural system. Agricultural is one of only a few

sectors in the U.S. economy in which exports are creating a positive trade balance. U.S. agricultural producers are not simply farmers and ranchers. They are often small business owners trying to survive and support their families and rural communities in a challenging global, technologically advanced, and competitive business environment. USDA works to ensure that American farmers and ranchers are prosperous and competitive, have access to new and international markets, can manage their risks, and are supported in times of unusual economic distress or disaster.” (excerpt from page 8 of Strategic Plan for 2010-2015)

The Small-Scale Livestock Operations study will collect data that will assist APHIS in its ability to support farmers in times of unusual economic distress or disaster, such as a foreign animal disease outbreak. An animal disease outbreak could significantly impact the survival of small-scale operations. The information collected will provide insight into how these small scale producers can best be served in an animal disease outbreak. Specifically, the study will collect data on biosecurity practices, preferred sources for information, and resources contacted in the event of a disease outbreak.

Collection and dissemination of animal health data and information is mandated by 7 U.S.C. § 391, the Animal Industry Act of 1884,³ which established the precursor of APHIS, Veterinary Services, and the Bureau of Animal Industry. Legal requirements for examining and reporting on animal disease control methods were further mandated by 7 U.S.C. § 8308 of the Animal Health Protection Act, “Detection, Control, and Eradication of Diseases and Pests,” May 13, 2002³.

Collection, analysis, and dissemination of livestock and poultry health information on a national basis are consistent with the APHIS mission of protecting and improving American agriculture’s productivity and competitiveness. In connection with this mission, the NAHMS program conducts national studies to investigate animal health related issues and examine general health and management practices used on farms. These studies are driven by industry and stakeholder interest, and information collected is not available from any other source on a national basis. Information about management and marketing practices on U.S. small-scale operations is useful to the small farm industry as well as many Federal and State partners.

National Surveys Providing Baseline Information

Data collected and analyzed by USDA's Economic Research Service (ERS) Agricultural Resource Management Survey (ARMS) group have already provided information far beyond the capability and resources of USDA:APHIS towards addressing the general question of factors affecting the survivability of small farmers. A publication titled *Small Farms in the United States: Persistence Under Pressure* released in February 2010 gives detailed analysis of the structure and challenges facing small farmers in the United States. NAHMS has consulted with the ARMS group about additional work which would lead to more specific information on factors affecting the survivability of small farmers.

³ United States Code § 391, and 7 U.S.C. § 8308 are available upon request.

In light of the ARMS work and previous NAHMS surveys which have also included small-scale livestock producers, for this survey the NAHMS group has attempted to target a population that has not been as well served previously by either ARMS or NAHMS surveys - that of production units with combinations of livestock species on the operations. And rather than directing questions at the more general area of factors affecting the survivability of small farms, questions are intended to identify specific areas within APHIS' purview which could aid this population of small farms. In other words, the survey is expected to yield information which APHIS could act upon directly to remove identified barriers to animal health on these smaller operations. This includes information about motivations for farming, the importance of off farm employment, product channels, and the role of health care professionals.

The Small-Scale Livestock Operations study will be the first NAHMS study focusing on multiple commodity small-scale operations. This study is designed to fulfill a critical gap in our knowledge of the small farm industry. It will focus on farms with total annual sales between \$10,000 and \$500,000 in an attempt to gain a better understanding of what makes small-scale operations successful, and what challenges they face.

Historically NAHMS studies have focused on individual commodity groups and have provided information by various operation size groups. Previous studies provide data on health and management on small operations, with operation size defined based on the number of head of animals present for the individual commodity group. This study will explore characteristics of farms that are small based on total annual sales, and will explore farms with mixed commodities present.

2. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the Agency has made of information received from the current collection.

Data collected, analyzed, and interpreted is disseminated to a wide variety of constituents. Producers will use the information to compare their operation's management practices with other small-scale operations regionally and nationally. Producer groups, extension specialists and veterinarians will use information derived from analyses to improve preventive measures and information outreach efforts. Pharmaceutical and biologics companies will use the information to plan and develop research and marketing strategies for their products. State and Federal officials will use the information to gain a more complete picture of small-scale operations as a basis for decision making, program planning and to direct funding. Public health officials will use the information to estimate the magnitude of health conditions which might affect public health. Research scientists will use the information to define current and future issues facing small-scale operations and direct research funding. Veterinary and agricultural students in universities in the U.S. will use these data for training in health management, animal welfare, nutrition, and environmental impacts.

APHIS will use the data collected to:

- Establish national statistics on management and marketing for producer, veterinary, and industry reference
- Address emerging issues for small-scale operations
- Plan for response to animal disease events by better understanding the needs and management practices of small-scale operations
- Provide input into the design of surveillance systems for specific diseases
- Model disease spread given multiple commodities present on operations

Small-Scale Livestock Operations study Data Collection Form

NAHMS-260 – Small-Scale Livestock Operations. This form will be sent out to participants via U.S. Mail. If a response is not received after two weeks, the questionnaire will be stamped “Second Request” and sent with the original pre-survey letter. If a response is still not received two weeks after the second request is sent (one month after the initial mailing), a NASS data collector will call the producer to administer the questionnaire via Computer Assisted Telephone Interview (CATI). Up to seven calls will be made, if necessary, to administer the questionnaire. If no contact is made after seven attempts, the respondent will be coded as inaccessible. There will not be any attempt to convert refusals other than a clear explanation of the importance of their voluntary participation during the phone call. Data from all completed mail questionnaires will be entered in a database by NASS. The CATI responses will be directly incorporated into the same database and no hard copy record will be available. Edit/validation specifications will be prepared by APHIS and incorporated by NASS.

- 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.**

Up to seven telephone calls will be made to all mail non-respondents and the questionnaire administered via Computer Assisted Telephone Interview (CATI).

- 4. Describe efforts to identify duplication.**

Literature searches for existing data relevant to small-scale operations have been performed. Available data were reviewed and compiled from all known sources. Sources reviewed include; cooperative state research, private industry and professional publications, diagnostic laboratories, other Federal and State agencies, and universities. Personnel from Federal agencies and academia were consulted in their area of expertise

to identify areas of potential duplication. No other entity is collecting this type of data on small-scale operations.

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

The study is designed to collect the minimum amount of data required from a minimum number of producers to ensure statistically and scientifically valid data. This is a voluntary program; it is at the discretion of the individual producer to decide whether or not it is desirable for them to participate. It will not have a significant impact on small businesses; however, 20 percent of small businesses will be asked to participate in the study.

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

The type and quality of data collected by the NAHMS through national collections are unique in the U.S. No other entity/source is collecting and analyzing this type of information. Small operations are an important area of interest which directly impacts the U.S. agricultural industry as a whole. Without collecting this type of information, the U.S.' ability to predict likely disease spread scenarios and detect trends in management, production, and health status on small-scale operations would be reduced or nonexistent. Furthermore, the ability to respond to international trade issues involving the health status and production practices in the U.S. agriculture would be severely reduced, potentially impacting the global marketability of animals, meat, and byproducts. Additionally, the information will be very useful for emergency preparedness and response.

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

- **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;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No special circumstances exist that would require this collection to be conducted in a manner inconsistent with the general information collection guidelines in 5 CFR 1320.5.

- 8. 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 form, and on the data elements to be recorded, disclosed, or reported. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB.**

The Agency's notice of information collection activity was announced in the Federal Register on Wednesday, September 22, 2010, pages 57736-57737. No comments were received.

Experts who were consulted:

Dr. Dawn Thilmany, Professor and Agribusiness Extension Economist, Colorado State University (970) 491-7220

Roger Ingram, Livestock and Natural Resources Farm Advisor, University of California, Davis (530) 889-7385

Dr. Suzanne Millman, Iowa State University College of Veterinary Medicine (515) 294-2817

The NAHMS staff is responsible for developing the basic content of the questions and a reasonable flow through the questionnaire. Upon much iteration a draft is sent to NASS

who assumes responsibility for the questionnaire thereafter. This includes review and editing for reasonable content, formatting questions into useable, producer and enumerator friendly terms and arranging questions for the best flow of the interview. Several exchanges of version development occur via Word software and then NASS enters the questionnaire into their Questionnaire Repository System which further standardizes the product. Many conference calls are completed between NAHMS staff and NASS in going over the various versions of the questionnaire. Item codes are then assigned and NASS performs the pretests, at least one in conjunction with the NAHMS staff.

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

There will be no payments or gifts provided to respondents.

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

Only summary estimates based upon the inference population will be reported to protect the privacy and confidentiality of individual producers/farmers. Only the NASS data collector will have knowledge of the participant's identity. All forms, data, and reports will refer to the respondent by a numeric code, which is assigned by NASS. All mailed-back completed study forms will be stored securely in a limited access records vault. Names, addresses, and personal information will not be collected and therefore no connection can be made between a completed questionnaire and a respondent's information. Completed questionnaires received via mail will have the name and address sticker "blacked out" by NASS prior to sending to APHIS.

NASS has statutory protection that allows them to keep on-farm data (such as producer name and address information) confidential. Several U.S. Codes apply to data collected by NASS:

- Title 7, Section 2276 - Confidentiality of Information.
- Title 18, Section 1902 - Disclosure of Crop Information and Speculation Thereon.
- Title 18, Section 1905 - Disclosure of Confidential Information Generally.

There are also additional protections available through the Confidential Information Protection and Statistical Efficiency Act (CIPSEA):

- Title V of E-Government Act of 2002, Public Law 107-347, Section 513. Fines and Penalties.
- Title V of E-Government Act of 2002, Public Law 107-347, Section 512. Limitations on Use and Disclosure of Data and Information.

Every NASS employee and appropriate APHIS employees or other individuals that may handle a questionnaire, or data coming from a completed questionnaire, are required to sign a form governing Certification and Restrictions on use of Unpublished Data. Furthermore, once reports are published, individuals are generally limited to the use of aggregate data files. Access to individual data files is restricted whenever possible to maintain respondent confidentiality.

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

There are no questions of a sensitive nature used in this collection activity.

12. Provide estimates of the hour burden of the collection of information.

A. A total of 4,128 burden hours are needed to complete this information collection activity. A detailed burden estimate has been included on the enclosed APHIS 71 Form.

B. Respondent costs: Estimated respondent costs for the information collection proposed is calculated based on a data collection estimate of \$10.82 per hour.⁴ The total respondent cost for the Small-Scale Livestock Operations study is \$44,665. (4,128 hours * \$10.82).

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include any hour burden shown in items 12 and 14).

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

14. Provide an estimate of annualized cost to the federal government.

The estimated cost to the Federal Government to administer the Small-Scale Livestock Operations study is \$60,082. For more specific information, please see the enclosed APHIS 79 form.

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB form 83-I.

This is a new information collection.

⁴ NASS Farm Labor, published report for 2010, released November 20, 2009, available upon request.

16. For collections of information whose results will be published, outline plans for tabulation and publications.

Information from this survey will be summarized immediately following the collection, editing, and cleaning of the data. Data will be entered into a database management system utilizing microcomputers or workstations, and statistical calculations will be performed, e.g., descriptive statistics including frequency distribution, prevalence, and point estimates. Variance measures and confidence intervals for the point estimates will be calculated in order to describe the precision of the descriptive statistics generated. SUDAAN software from RTI will be used to correctly calculate the standard error to account for the complex study design. Standard errors will be published along with the point estimates.

Considerable effort has been placed on reducing the time between the end of data collection and release of a final publication. Hardcopy information from the study will be made available to producers, universities, researchers, practitioners, animal health related industries, Federal agencies, legislators, and any other interested party. Copies of current and past information from NAHMS are available at <http://nahms.aphis.usda.gov>.

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.

APHIS is not seeking approval to not display the expiration date for OMB approval on the form used in this collection.

18. Explain each exception to the certification statement identified under “certification for paperwork reduction act submission,” of the Act.

APHIS is able to certify compliance with all provisions under the Act.