

February 19, 2014

Note to: David Hancock
From: Brian Richards
Subject: My Review of Proposed Data Collection: Local Food Marketing Directories and Survey (OMB No. 0581-New)

I. Overview

I received documents, relating to an OMB Docket to review, on 2/18/14. This docket pertained to a data collection proposal from the Agricultural Marketing Service (AMS). The proposal is “Local Food Marketing Directories and Survey” (OMB No. 0581-New). My review involved two primary documents – “2013 Supporting Statement – Part A – Justification” and “2013 Supporting Statement – Part B – Collections of Information Employing Statistical Methods”.

II. Specific Comments Relating to this Proposed Data Collection

The ultimate product of this data collection will be on-line directories for the following types of marketing channels: (1) on-farm markets, (2) Community Supported Agriculture (CSAs), and (3) food hubs. From reading this proposal, I learned that a previous, similar data collection effort was already approved by OMB. This related to a National Farmers Market Directory, and was approved 4/19/14. This marketing channel pertaining to traditional farmers markets can be thought of as a fourth channel, aside from the first three referenced earlier in this paragraph (and which are the basis of this proposal). *Since I understood that the (previously approved) National Farmers Market Directory already existed, I researched its availability on AMS’s website. I was able to find farmers markets, in this directory, that I knew existed close to my residence; and so this added some perspective to my understanding of what these directories will ultimately look like.*

Based on the information contained in these two documents, and the circumstances relating to this proposed data collection, I did not have much of a basis, to make an assessment of the statistical soundness of this study. From everything that I read, AMS seems like they are taking reasonable approaches in planning this data collection. Since there is no sampling involved, there is no associated sample design to review and assess. In the paragraphs below, I provide a few general comments; these may be helpful to AMS, as they anticipate possible questions that OMB may have, when they submit this proposal to them.

I was not able to review the proposed questionnaire. AMS is currently working with Michigan State University, to develop the questionnaire; so at present, it is not available for review. I was not totally clear on the following. Is the purpose of the questionnaire to (1) obtain input from entities associated with these marketing channels, so that AMS has a better idea of how the on-

line directories should look?, or (2) allow the entities to provide the actual information that they need to respond to, so that their entity may voluntarily list their operation in their respective directory. Perhaps the questionnaire will be designed to meet both of these objectives.

An important detail is the fact that “AMS has developed e-mail address lists for a large portion of farm operators in each direct marketing channel and continues efforts ...”. I consider this to be an important aspect of AMS’s overall effort to build a comprehensive directory. Their efforts in this regard, to “build their lists”, will help to assure a complete and comprehensive directory. At the same time, I understand that they have no control over whatever percentage of operations choose to not list their operation, since this is strictly voluntarily. Hopefully most operations will see this opportunity as a “free advertisement vehicle designed to enhance their marketing opportunities”.

From reading this proposal, the following future plans are in place: “ ... Summary statistical reports and cross tabulation reports will be prepared to examine the differences in data responses across regions, size, years of operation and comparisons will be made ... “. When the time comes, I am confident that AMS will use appropriate statistical methodology to carry out this analysis.