

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, and winter wheat. Major producing States are States that when combined, produce over 75 percent of the respective commodities.

- 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 their crops.

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.**

The majority of the data that are collected through the Objective Yield surveys are collected during visits by the NASDA enumerators to the target fields. Only the initial interview (Form A) is conducted with the farm operator. Field-level planted acreage information for the crop of interest (as reported on the base Agricultural Surveys, OMB No. 0535-0213) are preprinted on the Form A - Interview Forms. Respondents are asked to verify the information and report harvesting intentions for each field. This greatly reduces the amount of time respondents must spend during the initial interview for corn, cotton, and soybeans.

NASS management has directed our programmers and system developer's to concentrate their time on the surveys that have a greater amount of respondent burden. At some future date we may look into converting the Form A into an internet or computer based survey, but for now it will remain as a paper questionnaire.

- 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 for subsequent surveys during the growing season. The farmer will not need to be present for the follow up surveys. The data is collected by trained enumerators and the information requested can usually be provided with a minimum of difficulty and generally without respondents having to consult their record books. (Note, farm operators are encouraged to consult their records if they prefer to do so.)

- 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 initial interview is needed to confirm field characteristics and to request consent for study participation. Response burden is not affected by frequency of field observations 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 observations need to be conducted each month to monitor 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 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 was published in the Federal Register on November 17, 2014, on page 68405. NASS received two public comments, for this data collection renewal, one was from Dennis Fixler, Chief Statistician with the Bureau of Economic Analysis at the US Dept. of

Commerce. Mr. Fixler supports the continuation of this data collection. The second comment was from Ms. Jean Public. Both comments are attached to this submission.

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. Specifically, 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. NASS statisticians attend private agricultural professional meetings. Data user meetings are held each year as part of the effort by NASS to obtain input from a cross-section of agricultural interests.

Although NASS has not held data user meetings to discuss specifically the Field Crops Objective Yield Surveys, NASS interacts frequently with data users and industry representatives to improve measurement of acreage, yield, production, and other core content areas of the Field Crops Objective Yield Surveys. Future information collection requests will provide examples of these professional development and measurement discussions, when pertinent and how they have benefited the Field Crops Objective Yield Survey.

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.

The following CIPSEA Pledge statement will appear on all NASS questionnaires.

The information you provide will be used for statistical purposes only. In accordance with the Confidential Information Protection provisions of Title V, Subtitle A, Public Law 107-347 and other applicable Federal laws, your responses will be kept confidential and will not be disclosed in identifiable form to anyone other than employees or agents. By law, every employee and agent has taken an oath and is subject to a jail term, a fine, or both if he or she willfully discloses ANY identifiable information about you or your operation.

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. 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.

Burden hours based on the average completion time per questionnaire are summarized below.

2012 - 2014 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	
Corn	120032 A	2,000	1	1,780	1,780	20	593	220	220	2	7	60
Cotton	120033 A	1300	1	1,157	1,157	20	386	143	143	2	5	39
Potatoes	120038 A	1300	1	1,157	1,157	30	579	143	143	2	5	58
Soybeans	120034 A	1,900	1	1,691	1,691	20	564	209	209	2	7	57

Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 2,820 hours, are multiplied by \$25 per hour for a total annual cost to the public of \$70,500. NASS regularly checks the Bureau of Labor Statistics' [Occupational Employment Statistics](#). Mean wage rates for bookkeepers, farm managers, and farm supervisors are averaged to obtain the wage for the burden cost. The May 2014 mean wage for bookkeepers is \$18.30. The mean wage for farm managers is \$34.89. The mean wage for farm supervisors is \$22.86. The mean wage of the three is \$25.35.

- 13. Provide an estimate of the total annual cost burden to respondents or record keepers 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, and any other expense that would not have been incurred without this collection of information.**

The total federal cost for 2014 was \$5.3 million. The total cost includes all expenses for Federal salaries, NASDA field enumerator costs, training State and Regional Field Office staff, mileage, telephone, printing, overhead, and other miscellaneous costs. Costs for 2015 through 2017 are expected to remain about the same.

- 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 objective yield sample sizes used to calculate the annual average burden for the next three years were rounded off to reflect an average annual sample size. There are no changes in either respondent burden or number of responses from the current approval.

- 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.

Survey Forms for All Crops		
Form	Timing	Purpose
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.
C-2R	Pre-harvest	Part of research project for the United Soybean Board.
E	Just after sample field is harvested.	To record harvest loss information.
Q-1	Monthly	For supervisors to record quality check counts.
Q-3 & Q-6	Annually	Supervisors test the accuracy of scales annually at the start of each season.
R	Pre-harvest	Part of research project for the United Soybean Board.

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 Area Survey, the June Agricultural Survey, and the March Agricultural Survey, depending on the crop type as described below (OMB No. 0535-0213). For corn, cotton, and soybeans the acres reported in the June Area Survey 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 Area 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.

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/MannUsda/viewDocumentInfo.do?documentID=1046>.

Monthly releases are issued between the 8th and 12th of each month. End-of-season estimates are issued in mid-January in the *Annual Summary of Crop Production* release

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do;jsessionid=6BAEF6AAE991BC1B7351BE3B943FF309?documentID=1047>.

- 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 approval is requested for 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.

March, 2015

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