Supporting Statement - Part A

**FRUIT, NUTS, AND SPECIALTY CROPS**

OMB No. 0535-0039

**A. JUSTIFICATION**

This submission is a request for approval of this long-running information collection for 3 years. There are several changes in the survey program that is resulting in a 20.7% reduction in number of responses, but an 11.3% increase in burden hours. There is nearly a 50% reduction in the number of questionnaire versions being used. The combined comprehensive national questionnaire versions that replace the smaller, state specific questionnaires increase the number of questions asked of each respondent which leads to the increase in respondent burden hours. The reduction in responses is due to the reduction in frequency of contacts using the comprehensive questionnaire. This change is also reducing the overall costs for this program by a little more than 9%.

**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, value, and disposition. Estimates of fruit, tree nuts, and specialty crops are an integral part of this program. These estimates support the NASS strategic plan to cover all agricultural cash receipts.

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 agriculturists."

**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.**

Data reported on fruit, nut, specialty crops and Hawaiian tropical crop inquiries are used by NASS to estimate crop acreage, yield, production, utilization, price, and value in States with significant commercial production. These estimates are essential to farmers, processors, and handlers in making production and marketing decisions. Estimates from these inquiries are used by market order administrators in their determination of expected crop supplies under federal and State market orders.

Other government agencies also need these data. They were used during open trade negotiations with Canada and Mexico which resulted in the 1994 North American Free Trade Agreement. Estimates for these commodities are needed by the Risk Management Agency (RMA) for crop insurance issues and by the Farm Services Agency (FSA) to determine disaster payments. The International Trade Commission has used these data to resolve anti-dumping investigations, such as the March 1998 resolution of the dispute involving the shipment of apples to Mexico. Additionally, the information is used as base data for the Water Quality/Food Safety surveys.

In recent years the bee and honey industry has been very dependent upon this data as they travel around the country helping to pollinate crops as they come into bloom.

**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.**

Nearly all of the larger NASS information collections have been converted to Web-based data collection, what NASS calls electronic data reporting or EDR. Conversion of the dozens of versions of the fruit, nuts, and specialty crops questionnaires is progressing, where practical.

With the standardization of questionnaires, NASS is planning to conduct more centralized surveys which will use fewer questionnaire versions and concentrate all data collections into fewer times during the year. This should help to reduce the number and frequency of contacts per respondent.

The main portal for our on-line surveys is [http://www.agcounts.usda.gov](http://www.agcounts.usda.gov.). Once there, the respondents have to enter the valid survey code and their own user ID from the printed label of the questionnaire mailed to them. We do not want anyone other than a selected respondent to access the survey Web pages and enter data.

**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.**

NASS cooperates with State departments of agriculture and land grant universities to conduct agricultural surveys. This eliminates duplication of data gathering by more than one agency. For the commodities in this docket, if information is available from State agencies and other federal agencies, then NASS will use these administrative data to reduce burden on the public.

Each NASS Field Office (FO) maintains an up-to-date list frame of growers for each applicable commodity in this docket. By monitoring data collection periods for each commodity, cross-referencing growers by commodity, and combining information for multiple commodities on a single questionnaire, duplication of data collection is eliminated. Also, when the 2012 Census of Agriculture (0535-0226) is completed and the data are saved to our List Frame, we will be able to adjust our stratified samples to better reflect changes in this industry. This keeps total respondent burden to the lowest possible level.

**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.**

Information from growers can be provided with a minimum of difficulty and generally without having to consult their record books. Information from processors can be completed from normal day-to-day operating records. Administrative data is obtained for commodities that are State or federally regulated, thereby eliminating burden on growers and processors. Administrative data from other entities are used whenever possible. In instances where administrative data provides sufficient coverage and accuracy, we consider these opportunities to discontinue surveys and reduce burden.

In order to further reduce the overall respondent burden, NASS is incorporating stratified samples where possible, rather than conducting a complete enumeration of any group of specialty commodity producers. This allows NASS to concentrate more on the larger producers and greatly reduce the burden on the smaller producers.

**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.**

Collecting data less frequently would prevent USDA and the agriculture industry from being kept abreast of changes at the State and national level. The diversity of commodities included in this docket and the varying seasonality of each commodity warrants the frequency of data collection currently used by NASS. Data is collected for the different stages of production and consumption of the different commodities, for production, sales, prices, processing, and stocks.

During the fiscal year of 2013, NASS was forced to cut many of the surveys included in this docket as a result of the sequestration. NASS is requesting approval of the surveys included in this docket so that we will be ready to resume these surveys in fiscal year 2014, provided the funding is available.

**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;...**

Historically, some surveys were conducted monthly during the growing season to keep USDA and the agriculture industry abreast of changes at the State and national level. Timing and frequency of the reports have evolved to meet the needs of producers, agribusinesses, and government agencies.

Many of the specialty crop, fruit, and nut surveys were conducted at times of the year that coincided with the crop growth cycle(s) and harvest or marketing periods. This has helped to increase the accuracy of the data by reducing any possible memory bias.

With the sequestration many of these surveys were discontinued during fiscal year 2013. Provided funding is available in 2014, NASS plans to resume the frequency of the data collections. If only partial funding is available NASS will evaluate each of these programs to see where adjustments can be made to reduce the frequency of the surveys while still being able to provide data users with accurate and timely data.

**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 was published on February 14, 2013, on page 10596. 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.**

Consultations with the Extension Service, grower organizations, farmers, and other organizations occur on a regular basis, especially by our State and Regional Field Offices.

**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 confidential. U.S. Code Title 18, Section 1905 and Title 7, Section 2276 provide confidentiality for 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. 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.**

Total hours of burden are based on calculations shown in the following table, with a targeted response rate of 80%. Cost to the public of completing the questionnaires is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 18,358 hours is multiplied by $24 per hour for a total cost to the public of $440,592.

NASS regularly checks the Bureau of Labor Statistics’ [Occupational Employment Statistics](http://www.bls.gov/oes/tables.htm). Median wage rates for bookkeepers, farm managers, and farm supervisors are averaged to obtain the wage for the burden cost. The May, 2012 median wage for bookkeepers is $16.91. The median wage for farm managers is $33.32. The median wage for farm supervisors is $20.99. The mean wage of the three is $23.74.





The sample size is multiplied by 80% to get the Response Count. This is the target number of completed reports for each survey. The frequency of the surveys can vary with each survey, some are conducted monthly, some quarterly, some annually, some monthly-seasonal, some annually, etc. The non-response count consists of the 20% that are expected to be refusals or inaccessible records. The minutes per response are the average amount of time it takes to complete each questionnaire. Non-respondents are allotted 2 minutes to glance over the pre-survey letter or the questionnaire they receive in the mail before deciding to refuse to complete the survey.

The surveys that are being sent to processors or handlers are generally a complete census of this population, since these are relatively small populations. On the grower surveys we treated the largest producers as must records and included them all in our samples. For the medium and small size operations we selected a random sampling within each stratum for the target States. The estimate of burden for each of the surveys is based on a minimum target response rate of 80%.

**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.**

The total cost to the federal government to conduct the fruits, nuts and specialty crops surveys and prepare estimates is approximately $5.0 million, a reduction of approximately $500,000. The majority of the total savings are for personnel costs associated with data collection, analytical review, summarization, and publication of reports. Previously NASS had one statistician in each Field Office who was responsible for reviewing and setting estimates for each of the fruits, nuts and specialty crops for that State. With the standardization of questionnaires, and NASS’s move towards a Regional Field Office structure we have been able to consolidate the data collection, review, and estimation tasks. This consolidation of tasks will save NASS an estimated $500,000. While there was an overall increase in sample size and respondent burden, NASS was able to reduce overall costs, through the use of improved tools used for data collection, summarization and analysis of data. Previously each State would send out a commodity specific questionnaire to growers of that particular commodity who was selected to participate in our survey(s). With the standardization of the questionnaires we have eliminated many of the commodity specific questionnaires in favor of combined questionnaires. For example if a producer has several crops such as apples, peaches and pears, they will receive just the one questionnaire but all three commodities will be in the same form, rather than sending out 3 separate questionnaires. Within the internet versions and the Computer Assisted Telephone Interviews (CATI) we

will still be able to streamline the questionnaires and ask only the questions that are relevant to each respondent or each region of the country. The longer, more comprehensive survey will only be conducted once in mid-season and once at the end of the season. In the past some growers would receive multiple surveys during the growing season. The longer questionnaire will reduce the frequency that the farmers will be contacted.

Since the previous submission NASS has been working to consolidate and standardize many of the questionnaires we are using. The most noticeable changes have occurred with the non-citrus tree fruits and nuts. Overall we have reduced the number of state specific questionnaires by nearly 50% in favor of standardized U.S. questionnaires. .

**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 annual burden of 18,358 hours is up 1,869 hours above the previous inventory of 16,489 hours. The increase is a result of several miscellaneous program changes. NASS is continuing to combine many of our smaller surveys into fewer combined questionnaires. This will allow us to collect data on multiple commodities at the same time. We anticipate a slightly larger overall number of respondents (5,095 additional respondents) but we will be able to reduce the number of overall responses by 19,440.

**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.**

Questionnaires for all surveys in this information collection are returned to the State or Regional Field Offices and reviewed for reasonableness prior to keying into data processing media for summarization. State and/or Regional statisticians analyze survey results, recommend estimates or forecasts for their State(s), and transmit the data to Washington, D.C. State survey results are summarized nationally and by major regions or State groupings. Individual State recommendations are reviewed and changed, if necessary, to reach national and regional estimates.

During the forecast season, questionnaires are mailed to growers with a reference date of the first of the month. Most production forecasts are released in the Agency's monthly *Crop Production* report released between the 8th through the 12th of the same month. Exceptions are the mid-June forecasts of sweet and tart cherries and the mid-August forecast of cranberries which are issued separately.

Growers’ disposition questionnaires are mailed soon after completion of harvest for non-storage crops or at the end of the marketing season for storage fruits. End-of-season estimates for all noncitrus crops are published in the January *Noncitrus Fruits and Nuts Preliminary Summary*. The *Noncitrus Fruits and Nuts Summary* report is issued the following July to show final utilization and value estimates for storage crops such as apples, grapes, pears, and tree nuts. Also included are miscellaneous crops in California and Hawaii for which final market records and processor data were not available in December. End-of-season citrus acreage, yield, production, price, and value estimates including final utilization and price data for the previous marketing season are published in the September *Citrus Fruits* release.

Orchard and Vineyard Inventory Surveys are issued as special reports. Generally, inventory surveys are conducted January through March. Bearing acreage and yields per bearing acre are published by State and crop in the Citrus Fruits Summary and the Noncitrus Fruits and Nuts Preliminary Summary and final Summary.

These publications are available on-line immediately after release at:

<http://www.nass.usda.gov/Statistics_by_Subject/index.php?sector=CROPS>

Once there, select first letter of report title from alphabet list and then specific commodity or publication.

A complete listing of the NASS data publications can be found at the following web site:

<http://www.nass.usda.gov/Publications/Reports_By_Date/2013/May_2013.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.**

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.

May 2013

Revised August 2013