Supporting Statement - Part A

**FIELD CROPS PRODUCTION**

OMB No. 0535-0002

**TERMS OF CLEARANCE**

Date 02/25/2013

TERMS OF CLEARANCE: Terms of the previous clearance remain in effect. The information collection is approved conditional on the following: the plan to evaluate the extent of non-response and non-response bias for probability sample surveys, censuses, and coverage surveys with an observed response rate of less than 80% (added to this docket) will be used to complete the evaluation, which will be received prior to the next request for clearance for this docket..

**REPLY** –

As a part of normal operating procedures NASS sets a target level to get a positive response rate of at least 80% on all surveys, but more importantly to achieve greater than 70% coverage of the commodity being surveyed.  Some surveys may have a high level of coverage, but the desired response rate is not achieved due to size and distribution disparity in the population. A limited number of producers often account for a large proportion of the item of interest.  In addition, many of these surveys are not sample surveys, but complete censuses of the small target populations.  Standardization processes are under way across NASS field crop surveys to ensure consistent statistical methods are in place that produce sound estimation outcomes which adhere to coverage and response rate targets. Standardization will reduce the number of surveys needed to maintain a reliable statistical estimation data series and in turn reduce respondent burden.

The following NASS standardized surveys have response rates that fall below 80% and also below 70% coverage: Potatoes, Variety, and County Estimates. We have chosen to do a nonresponse bias study for the Potato surveys since there are three seasonal surveys related to potatoes and it is an important crop in the states with substantial potato acreage.

Potatoes

The Potato Production Disposition and Income surveys had response rates below the target 80 percent rate and the coverage was below the desired 70 percent rate. NASS conducted a bias study of the three seasonal surveys and the results indicate that the operational summary is biased downward. With the standardization of these surveys in 2014, NASS is taking measures to correct the bias. The complete results of this study are attached to this submission.

County Estimates

The two County Agricultural Production Surveys (CAPS) obtain information needed for the county level estimates of crop acreages and yields. The data from these two surveys are used along with the Farm Service Agency’s (FSA) administrative acreage data and remote sensing acreage and yield data to estimate the county level acreages and yields. Official state and U.S. level estimates are set from the data collected on the quarterly Crops Acreage, Production, and Stocks Survey (OMB No. 0535-0213) and published before the county estimates. Small grain crop estimates at the state and U.S. level are published in the Small Grains Summary report released at the end of September. The small grain county estimates are released in December. Row crops state and U.S. level estimates are published in the Annual Crop Production report in early January, and the county estimates are published mostly in February, but some are later, from two to nine months depending on the crop.

Since the state level numbers have already been published, the purpose of CAPS is to collect additional data so that we can allocate the acreage and production to geographic sub domains (district and county). With the state estimates already determined, there is a low risk of bias for the county estimates surveys at the national level.

Additionally, NASS has contracted with the National Academies of Science for a panel to review and provide recommendations to improve the small area estimates for counties, this panel is planning to meet at the end of 2015.

Variety Surveys

The Wheat and Barley Variety surveys have a similar objective as the County Agricultural Production Surveys (CAPS). They are allocating already published official estimates into classes or varieties. On a national level the risk of bias for the variety surveys is low.

Crop Progress (Crop Weather)

With surveys such as the Weekly Crop Progress, we are asking respondents to provide us with observations and their opinion of the growing conditions and crop conditions in their area. This is not a probability based survey sample, but we can examine the extent of refusal and other forms of nonresponse and its impact on the resulting data, if any. In addition, since the growing conditions are changing continuously and on a regional basis, later follow-up contacts are also not feasible. To help ensure quality data we collect information from crop observers with local knowledge in each area of interest.

Specialty Surveys

The smaller specialty surveys such as mint, alfalfa seeds, and dry beans and lentils are conducted by the Regional Field Offices (RFOs). Once they are moved over to a centralized edit and summary system NASS will be able to conduct a non-response bias study on any of these surveys that are still below the desired 80 percent response rate or the 70 percent coverage rate.

**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 functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors. NASS conducts probability surveys where possible, as documented in OMB docket No. 0535-0213 (the Agricultural Surveys Program for the major crop commodities such as corn, soybeans, and wheat). Most of the more specialized field crops such as potatoes, tobacco, dried beans, and mint are included in this docket. Because of unique field crop characteristics, such as concentration of a crop in localized geographical areas or the relative importance of the crop, the use of supplemental follow-on surveys is needed. The surveys in this docket use a combination of data collection modes that include mail, telephone, internet, and personal interviews. This data collection approach helps to ensure that NASS is publishing accurate, timely data.

Commodity-specific surveys for alfalfa seed, dry beans, dry peas, lentils, mint, special oilseeds, sunflowers (non-oil), popcorn, potatoes, sweet potatoes, sugarbeets, sugarcane, and tobacco are used in those States where better coverage of localized growing areas is needed. Results are published in the next monthly *Crop Production* release. In some States and with certain commodities, it has proven to be more effective if we include commodity price information, stocks and some processing questions on the production questionnaires. This has helped to reduce the frequency at which individual operators are contacted to collect data.

Variety surveys are conducted in several States to estimate acreage planted by wheat and barley variety. The wheat variety survey is conducted as part of State cooperative agreements. The barley variety survey is conducted as part of a cooperative agreement with the American Malting Barley Association.

The County Agricultural Production Surveys (CAPS) or County Estimates Surveys are conducted each year at the end of the growing season to help estimate field crops acreage harvested and final production at district and county levels. In item A.12. NASS has identified two separate county estimate surveys, small grains and row crops. The small grains survey covers bread and cereal grains. These crops are harvested in the summer months (May – July), so we conduct a county estimate survey following harvest to minimize memory bias. The row crops (corn, soybeans, etc.) are harvested in the fall or early winter, so this data is collected in December and January. The two samples are pulled independently, so it is possible that a farmer could receive both questionnaires if they produce both types of crops.

The weekly Crop Progress and Condition Survey, published in *Crop Progress,* provides timely information about the development and condition of crops between issues of the monthly *Crop Production* release. Questions concerning soil moisture content, insect or disease presence, and the stages of crop production are also asked to better inform farmers of conditions in their region as well as other parts of the country.

The annual Cash Rent Survey samples farmers who have rented land historically on a cash basis. These data will be used to satisfy the requirement originally specified in the 2008 Farm Bill to publish county level cash rent data for both crop land and pasture land.

The annual Wildlife Damage Survey is a reimbursable survey that targets farmers who operate land in the reference year.  The objective of the survey is to 1) estimate damage by species, 2) determine what control methods were used for deer, and 3) determine their attitudes toward deer on their property.  These surveys are critical in understanding damage caused to crops, deer control measures, and farm operator’s perceptions of deer populations. Information provided by farm operators will be used to manage wildlife population at a level that is appropriate for multiple stakeholders.

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.**

Crop forecasts published in the monthly *Crop Production* report and other releases, are used by farmers, agribusinesses, and many government agencies in analyzing the nation's production and marketing of field crops and grains. The Secretary of Agriculture uses estimates of crop production to administer farm program legislation and import and export programs.

The weekly crop progress and condition inquiry, published in the *Crop Progress* report every Monday, provides an efficient way for the Department of Agriculture to closely monitor agricultural developments across the country which may affect the nation's food supply. Numerous briefing reports are prepared for the Secretary of Agriculture on crop condition, phenological development, and harvest progress. The reporting of insect and disease damage can alert farmers in other areas to take preventive measures, thus minimizing possible damage. Information on soil moisture and extremes in temperatures can be used to predict potential crop yields. This information is very useful to farmers who are deciding on the appropriate time to sell their crops (through futures markets or through cash sales).

County estimates for field crops are needed by the Farm Service Agency (FSA) and the Risk Management Agency to carry out their respective legislative mandates**.** Their primary use of the data is to determine average yields by county, used in determining participating farmers’ compensation payments. The county-level cash rent survey data enable FSA program payment rates to better reflect market conditions. The information is useful to the Natural Resources Conservation Service (NRCS) for administering programs. The information will also benefit the agricultural sector more generally by enabling the rental market for cropland to operate more competitively.

Variety surveys are used by the Agricultural Research Service, plant breeders, researchers, and growers to determine the acreage by variety and measure acceptance of new varieties. The impact of insect or disease outbreaks can be measured from variety surveys after the tolerance of a particular variety is determined. Varietal data on wheat are used for determining production and available supplies by class. Class data are of great importance to government analysts and exporters in planning the disposition of U.S. wheat crops since exports comprise approximately one-half of total use.

**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 NASS information collections have been converted to Web-based data collection, what NASS calls electronic data reporting (EDR). Most of the survey instruments for the following commodities have been converted: dry beans, mint, special oilseeds, potatoes, sugarcane, non-oil sunflower, sweet potatoes, tobacco, and the weekly crop progress and condition report. The conversion of several more of the smaller surveys will be completed this year. The remaining instruments that will not be converted are either too infrequent or too impractical to use that mode of data collection. The current proportion of survey responses that employ the Web is at 65.1 percent for crop progress, 2.7 percent for row crop county estimates, 1.9 percent for small grain county estimates, and about 2 percent for the remaining information collections that are available on the internet. This results in an overall Web response rate of 21.8 percent for all surveys included in this docket.

While web reporting is offered to nearly all of our survey respondents, the majority of our respondents do not reply to our surveys using the internet. The Crop Progress survey is an exception due to the target population. Crop Progress targets people who are knowledgeable of the agriculture in their county or district and can report to this survey on a weekly basis. The majority of the people sampled by this survey are County, State, or Federal employees; Agricultural teachers at local schools; NASDA field enumerators who are also farmers; etc. Since these people have a relatively short time frame in which to respond (weekly) and tend to have convenient access to the internet, they prefer to respond online. With many of our other surveys, farmers may only be selected to conduct a survey once every couple of years and may not have easy access or be familiar with the internet, so they would rather just fill out the paper questionnaire and mail it back in.

Some surveys are conducted on a weekly or monthly basis. NASS will mail out a questionnaire to the respondent with instructions on how to respond by internet or return the questionnaire by mail. If we have not received their response within a few days we must switch over to either phone or personal enumeration. On the majority of our monthly and quarterly surveys the data collection period is limited to approximately 10 days. Using the intense modes of data collection that NASS relies on is the only way in which we can achieve one of our primary directives – the collection and publication of quality data in a timely and useful manner.

The main portal for our on-line surveys is <http://www.agcounts.usda.gov>. Once there, the respondents have to enter the valid survey code and the user ID printed on the label of the questionnaire mailed to them. We do not want anyone other than the selected respondent to access the survey web pages

**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. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Some States have added a few additional questions to their questionnaires to accommodate the needs of their State cooperators and eliminate the need for a separate survey for some of these specialty crops. There is no duplication of questions that are included in the questionnaires attached to this docket except for the quarterly Crop/Stocks surveys (OMB# 0535-0213). The County Agricultural Production Surveys (CAPS) collect data from additional operations on acres planted and harvested along with production data. This supplemental sample is combined with the quarterly data to allow NASS to be able to publish county level data. The samples are carefully compared to ensure there is no overlap.

**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 requested on surveys included in this docket can be provided with a minimum of difficulty by respondents, generally without having to consult their record books.

1. **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 eliminate information needed to keep the U.S. Department of Agriculture abreast of changes at the State and national level. Timing and frequency of the various reports have evolved to meet the needs of Department clients, including producers, agribusinesses, and government agencies, yet minimize burden on the reporting public.

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

There are no other special circumstances that would cause the information collection to be conducted in a manner inconsistent with the general information guidelines in 5CFR1320.5.

**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 April 16, 2015 on pages 20466-20467. One public comment was received from Ms. Jean Public. It is attached to this renewal package.

**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 plant breeders, researchers, growers, industry associations, and other government agencies such as FSA and NRCS are carried out to ensure that data collected reflect all varieties and the proper timing to obtain accurate information.

**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 these 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 appears 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.

All individuals who may access these confidential data for research are also covered under Titles 18 and CIPSEA and must complete a Certification and Restrictions on Use of Unpublished Data (ADM-043) agreement.

**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.**

The following table contains the estimated burden hours for the surveys by year and the average annual burden. Totals may vary due to rounding. 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 200,919 hours is multiplied by $25 per hour for a total annual cost to the public of $5,022,975.

NASS regularly checks the Bureau of Labor Statistics’ [Occupational Employment Statistics](http://www.bls.gov/oes/tables.htm). 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.

Average completion time per questionnaire is based on time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate and minutes per response shown are the average times for all questionnaires used for the commodity.





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

There is no cost burden to respondents.

**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 field crop surveys and prepare estimates is estimated to cost approximately $10 million per year for the next three years, most of which is staff cost.

**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 total burden of 200,919 hours is up 53,942 hours from the current inventory of 146,977 hours. The net increase is due to a combination of program changes and agency adjustments, which are displayed in the following table. The burden is broken out by survey and by response or non-response. The biggest factors in the increase are the inclusion of burden associated with the cover letter and internet access instructions (omitted in previous burden calculations) and the addition of new surveys.



**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 are mailed out to each person in the target samples for the surveys included in this data collection request. Respondents who do not return their questionnaires by mail or internet will be attempted by phone enumeration. On surveys such as the weekly Crop Progress survey, we encourage the respondents to use the internet to complete the questionnaires due to the very short data collection period. The data are reviewed for reasonableness prior to data processing for editing and summarization. They are summarized by crop reporting districts and the indications are weighted for the State, based on the relative importance of the commodity in the district. State indications are plotted on time series charts which typically comprise 10 years of survey indications and final estimates. Three primary indicators are obtained for each crop: an identical comparison of current year acreage to the previous year acreage, acreage as a percent of total farmland, and average yield for respondents reporting.

Crop production estimates are issued from Headquarters in Washington, D.C. in the monthly *Crop Production* reports, the January annual summary, June acreage report, or specialty releases as shown in the table below. Crop progress and condition data are published in the weekly *Crop Progress*. State-funded cooperative survey reports may be released from the individual Field Offices as well as in Headquarters publications. The *Weekly Weather and Crop Bulletin* is prepared in cooperation with the National Weather Service Meteorologists, USDA's Cooperative Extension Service, and World Agricultural Outlook Board.

**2014 Field Crops Production Surveys**

| **Survey** | **Data Collection**  **Period** | **Publication** | |
| --- | --- | --- | --- |
| **Publication Name** | **Release Date** |
| Alfalfa/Grass Seed | Jan | *FO monthly release* | Feb - Mar |
| Dry Beans | Jun - Nov | *Crop Production* | 12th of month |
| Mint | Nov | *Annual Summary* | January |
| Oilseeds, Special | Oct - Dec | *Crop Production* | 12th of month |
| Potatoes | Mar - Dec | *Crop Production* | 12th of month |
| *Potatoes* | Sep 20 |
| Sugar beets | Mar, Jun, Aug-Nov | *Crop Production* | 12th of month |
| Sugarcane | Jun; Aug-Mar | *Crop Production* | 12th of month |
| Sunflower, Non-oil | Mar, Jun, Dec | *Crop Production* | 12th of month |
| Sweet potatoes | Feb, Jun | *Ag Prices* | End of month |
| Tobacco – Yield | Aug & Oct | *Crop Production* | 12 of month |
| Tobacco - Price | Feb & May | *Crop Production* | 12th of month |
| Variety Surveys: Barley | Jan | *Variety Summaries* | Feb |
| Crop Progress | weekly Apr-Nov | *Crop Progress* | Mondays |

These publications are available on-line immediately after release at

<http://www.nass.usda.gov/Publications/Reports_By_Title/index.asp>.

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

National Crop Progress and Condition Reports:

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1048>.

State Crop Progress and Condition reports:

<http://www.nass.usda.gov/Publications/State_Crop_Progress_and_Condition/>

Crop Production Releases:

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1046>.

Potatoes Annual Summaries:

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1123>.

County Estimates Release Schedule for 2014 production:

<http://www.nass.usda.gov/Data_and_Statistics/County_Data_Files/Release_Schedule/index.asp>.

Agricultural Land Values:

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1446>.

Statistics by State for specialty commodities:

<http://www.nass.usda.gov/Statistics_by_State/>.

**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.

July 2015

Revised October 2015