

## 1 Supporting Statement

### Organic Certifier Survey (OCS)

OMB No. 0535-NEW

U.S. sales of organic foods have shown double-digit growth nearly every year since 1990, according to estimates by the Nutrition Business Journal and its parent company. USDA sees a key role for various types of farm production—including organic farming—in meeting our global and domestic food needs, increasing sustainability and enhancing farm profitability. Secretary Vilsack has included expansion of U.S. certified organic operations among the Department’s high-priority goals.<sup>1/</sup>

The National Agricultural Statistics Service (NASS) of the United States Department of Agriculture (USDA) is submitting this new information collection request to conduct the Organic Certifier Survey (OCS). The Economic Research Service (ERS), within the USDA, requests that NASS collect data from USDA-accredited State and private certification groups. The data will be used to calculate the growth of certified organic farmland acreage and livestock in the United States.

#### 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.**

U.S. consumer demand for organically produced goods has grown rapidly since USDA established national standards for organic production and processing in 2002. Domestic production of many organic crops and livestock specialties has also increased during this period. The U.S. had under a million acres of certified organic farmland when Congress passed the Organic Foods Production Act of 1990. By the time USDA implemented national organic standards in 2002, certified organic farmland had doubled, and doubled again between 2002 and 2005. Between 2005 and 2011, certified organic pasture and rangeland fluctuated up and down, but certified organic cropland expanded nearly 80 percent, to 3.1 million acres. Organic livestock sectors have grown even faster.<sup>2/</sup>

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<sup>1/</sup> Excerpt from a presentation made to NASS by USDA Economic Research Service (ERS) on July 17, 2015.

<sup>2/</sup> USDA ERS, Organic Production, Documentation Overview. September 27, 2013

<http://www.ers.usda.gov/data-products/organic-production/documentation.aspx>.

Government research and policy initiatives often play a key role in the adoption of new farming technologies and systems. USDA has a current goal to increase the number of certified organic operations and is expanding programs and services for organic producers and handlers. Funding for organic research, certification cost-share assistance, and other programs has been increasing since 2002, when national organic standards were implemented (see 2014 Farm Act-Highlights and Implications: Organic Agriculture).<sup>3/</sup>

The USDA Economic Research Service (ERS) maintains data series they collected from Organic Certifiers for approximately 20 years. ERS discontinued collecting the data at the end of 2013. NASS is seeking approval to collect data from these certifiers for data relating to the calendar years 2014 and 2015. In 2016 the USDA Agricultural Marketing Service (AMS) National Organic Program (NOP) will take over this data collection.

With this voluntary survey, NASS plans to collect farm operation level data from the certifying agents for all operations that were certified as organic producers. After the data have been processed through NASS's confidentiality and disclosure protocol, aggregated data will be published for public consumption.

**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.**

This new data collection will allow ERS and NOP to maintain their data series and analysis of organic commodities produced in the United States. Organic farmers, grower associations, universities, and other researchers will be able to use this continuation to a long running data series to project future changes to this growing industry.

**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 initial operation profiles will be conducted through face-to-face interviews only. Trained NASS employees or National Association of State Departments of Agriculture (NASDA) enumerators will collect the data from the organic certifiers' records. NASS will accept the data in whichever form is most convenient to the

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<sup>3/</sup> USDA ERS, Organic Production, Documentation Overview. June 2, 2015

<http://www.ers.usda.gov/topics/natural-resources-environment/organic-agriculture.aspx>

certifiers. In the past ERS received data in various forms, ranging from electronic spreadsheets to hardcopies of producers' organic system plans. NASS will

either import the data electronically or key-enter the data so that a computer edit and summary can be performed. Aggregate figures will then be published (after going through a disclosure procedure).

- 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.**

This survey will be a census of all organic certifiers in the United States who certify organic farmers and ranchers. In order to become a certifier, an individual must first be trained by AMS NOP.

- 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.**

There are approximately 55 organic certifiers in the United States who are authorized to certify domestically grown products. In order to minimize burden on all respondents, NASS will provide trained enumerators to collect the data from the respondents' records.

- 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.**

These data are necessary on an annual basis for ERS and NOP to provide annual data and analysis of this growing industry. Farmers, consumers, shippers, packers, retailers, wholesalers, etc. all need these data to make informed decisions. Any less frequently collected data would greatly hinder the usefulness of this data series.

- 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 September 25, 2014 on pages 57503 - 57504. NASS received 4 public

comments. The complete comments and any responses to these letters 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 record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Over the last two years NASS has consulted with:

Betsy Rakola  
USDA Organic Policy Advisor

Miles McEvoy  
USDA, AMS, National Organic Program  
Deputy Administrator

Jennifer Tucker, PhD  
USDA, AMS, National Organic Program  
Associate Deputy Administrator

Stacy Swartwood  
USDA, AMS, National Organic Program  
Programs/Systems Analyst

Catherine Greene  
USDA, ERS  
Agricultural Economist

Steve Etko  
National Organic Coalition

Marni Karlin  
Organic Trade Association

**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.**

All questionnaires include a statement that individual reports are kept confidential. The specific Census of Agriculture citation, Title 7 U.S. Code Section 2204(g), plus Title 18 Section 1905 and 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 future 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.

NASS will collect farm level data from the organic certifiers. Farm level data are needed in order to perform disclosure review to ensure no individual farm operations are discernable in the published aggregated data.

The organic certifiers will be asked to sign disclosure agreements to permit NASS to publish data which may reveal their identities. NASS will also perform a disclosure review at the certifier level, should some organic certifiers not sign the disclosure agreements.

**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.**

In determining the length of time it would take to complete each questionnaire NASS began with the time reported by the ERS, who previously conducted these surveys. After meeting with numerous experts to modify the content and flow of the questionnaires, a NASS survey methodologist worked to further streamline and simplify improve the appearance of the questionnaires. Our methodologist then estimated the average amount of time each questionnaire would take to complete. These numbers are used in the calculation of the total respondent burden. NASS also included burden calculations for the reading of the pre-survey letter and fact sheet that will be sent to each respondent at the beginning of the survey period.

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 885 hours, are multiplied by \$23 per hour for a total annual cost to the public of \$20,355.

NASS regularly checks the Bureau of Labor Statistics' [Occupational Employment Statistics](#). Mean wage rates for bookkeepers, agricultural inspectors, purchasing agents, and first-line supervisors are averaged to obtain the wage for the burden cost. The May 2014 mean wage for bookkeepers was \$18.30. The mean wage for agricultural inspectors was \$20.97. The mean wage for purchasing agents was \$29.02. The mean wage for first-line supervisors was \$22.86. The mean wage of the four job classifications is \$22.79.

**Census of Organic Certifiers - 2015**

Survey	Sample Size	Freq	Responses				Non-response			
			Resp. Count	Freq x Count	Hours/ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours
Operation Profile and Orientation	55	1	55	55	1	55	0	0	2	0
Annual Organic Certifier Survey	55	1	55	55	15	825	0	0	2	0
Cover Letter and Publicity Materials	55	1	55	55	0.0833	5	0	0	2	0
<b>Total</b>	55		55			885	0			0

This survey will be conducted only one time under this approval. NASS will collect data for calendar years 2014 and 2015 during the same visit with the respondent. Pending the AMS NOP's full deployment of the Organic Integrity Database, NASS will discontinue this data collection and AMS NOP will take over collecting these data on an annual basis beginning in 2016.

**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 cost to the Federal Government for the Organic Certifier Survey that is included in the 2016 Department of Agriculture Budget is \$550,000. The approximate cost breakdown is as follows: federal personnel \$255,000; NASDA field and phone enumerators \$115,000; data processing \$158,000; and printing, training, and other miscellaneous costs \$22,000.

**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).**

Since the Organic Certifier Survey is a new survey to NASS, there is not a current inventory of burden hours. From the calculations in A.12, we estimate a total of 885 respondent burden hours will be needed. The time that is allotted for the screening or initial phase will cover the time it takes to collect operation level data identifying the certifier, the area they cover, the types of record keeping they prefer using, etc. In addition, NASS will discuss how the data will be collected, summarized, and published. NASS's confidentiality rules will be explained, and respondents will be asked to sign a disclosure agreement that gives NASS consent to publish (in aggregate form) the data collected.

The annual survey is estimated to occupy approximately 15 hours per respondent. If the certifiers have their records in computerized databases and can provide us with electronic files, the burden will be minimal.

**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.**

Approximate time schedule for the 2014 - 2015 OCS:

Questionnaire Design (Drafts for Testing)  
Complete List Building

August 2015  
September 2015



Questionnaires Finalized	September 2015
Target OMB approval date	February 1, 2016
Operation Profiles Conducted	March – June. 2016
Data collection	March – June 2016
Preliminary summary and publication	Late 2016

The data will be available on the NASS website. <http://www.nass.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.**

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.

August, 2015