

**COST of POLLINATION SURVEY**

OMB No. 0535-NEW

The National Agricultural Statistics Service (NASS) is seeking a three year approval to conduct a new group of voluntary surveys that will collect data related to the costs involved with the pollination of various crops from across 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.**

As pollinators, honey bees are vital to the agricultural industry. Ad hoc surveys showed a dramatic rise in the number of disappearances of honey bee colonies in North America in late 2006; disappearances ranged from 10 to 15 percent annual colony loss in some areas to greater than 30 percent in other areas. Often called Colony Collapse Disorder (CCD), the condition occurs when worker bees from a beehive or honey bee colony abruptly disappear, with minimal mortality evident near the hive and food supply readily available. The mechanisms of CCD and the reasons for its apparent increasing prevalence remain unclear. Possible factors include infections with Varroa mites and other pathogens and viruses; pesticides, such as the neonicotinoid class; inadequate nutrition and loss of natural forage habitat; genetic factors; and changing beekeeping practices and stress on colonies from transportation.

The collapse or decline of honey bee colonies is significant economically because many agricultural crops are pollinated by honey bees. USDA's Economic Research Service (ERS) estimated gross revenues of pollination services at \$655.5 million in 2012, and shortages of honey bees in the United States have led to substantial increases in the cost to farmers renting them for pollination services. However, there are few consistent, statistically defensible reports to accompany ERS's data. Therefore, NASS was given the task of collecting pollination cost data by the President's Pollinator Health Task Force (May 19, 2015).

USDA and the Environmental Protection Agency (EPA), in consultation with other relevant Federal partners, are scaling up efforts to address the decline

of honey bee health with a goal of ensuring the recovery of this critical subset of pollinators. NASS supports this *Pollinator Research Action Plan*, which emphasizes the importance of coordinated action to identify the extent and causal factors in honey bee and pollinator declines.

NASS' primary focus will center on costs associated with honey bee pollination, but will also collect some basic information relating to other forms of pollination.

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.**

The need for NASS to expand its programs was initiated by the Presidential Memorandum "Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators," issued on June 20, 2014 to take "steps to reverse pollinator losses and help restore populations to healthy levels." The memorandum can be found at this link <https://www.whitehouse.gov/the-press-office/2014/06/20/presidential-memorandum-creating-federal-strategy-promote-health-honey-b>. To this end, NASS is committed to collaborating with USDA and the other departments on a unified and complementary approach to the President's pollinator health initiative.

Data that are collected from beekeepers through the expanded Bee and Honey Survey (OMB# 0535-0153) and the Colony Loss Survey (OMB # 0535-0255), combined with the cost of pollination data collected from crop farmers (fruits, nuts, vegetable and specialty crops) will provide researchers with a comprehensive view of the honey bee/pollinator industry. These data will give a more detailed view of the expenses associated with pollination and help policy makers, crop producers, and beekeepers "ensure the sustainability of our food production systems" and "avoid additional economic impact on the agricultural sector". Furthermore, estimates from the Cost of Pollination survey will be used to fulfill the needs in the Pollinator Research Action Plan which specifically calls for NASS to conduct the Cost of Pollination Survey. <https://www.whitehouse.gov/sites/default/files/microsites/ostp/Pollinator%20Research%20Action%20Plan%202015.pdf>

The *Cost of Pollination Inquiry* will collect data relating to the primary crops that rely on honey bees and other pollinators to perform the tasks of pollination. By publishing both regional and crop specific pollination costs, both, crop farmers and beekeepers will be able to benefit from this additional data. Federal and State Departments of Agriculture, universities, various Federal Agencies, and numerous other people will be able to benefit from this data as well.

- 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.**

NASS' Questionnaire Repository System (QRS) was built to enable the simultaneous creation of comparable paper and web survey instruments for almost any survey. This being a group of new surveys, NASS aims to develop an internet version along with a computer assisted telephone interview (CATI) during the first year of data collection. NASS utilizes multiple modes to collect data. Initially, NASS will mail paper questionnaires to the target sample and follow-up with telephone and face to face interviews with non-respondents. Once internet and CATI versions of the questionnaire are developed, they will be added to the other modes offered to respondents. This will allow the respondents to reply by whichever means they are most comfortable using.

NASS is scheduled to begin data collection on the Cost of Pollination surveys in December 2015. Data collection efforts will be coordinated with end of year crop production surveys if possible, to help minimize any burden on respondents.

- 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 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 agriculture industry. Data collected on these surveys 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.**

Data collection will be conducted once per year with a standardized questionnaire that will capture all needed data.

The Small Business Administration defines, in 13 CFR, part 121, small agricultural producers as those having annual receipts of no more than \$750,000 and small agricultural service firms (handlers and importers) as those having annual receipts of no more than \$6.5 million. Out of the total estimated sample size of 50,000, approximately 42,470 operations are classified as small entities or approximately 85 percent.

**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.**

NASS has attended numerous meetings and tradeshow around the country and has obtained a great deal of input from data users and beekeepers as to what sort of published data they need and what sort of production data individual growers could provide. NASS works closely with the USDA Economic Research Service (ERS) to pinpoint exactly which data would be most useful.

**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 Federal Register Notice soliciting comments was published on August 3, 2015 on pages 45932 – 45933. NASS received one public comment, it was from Ms. Jean Public, and the comment is 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.**

NASS has worked closely with beekeepers, crop producers, researchers, and other government agencies to clarify which data would be most useful and how best to collect data. NASS studied previous reports from the University of Wyoming and USDA, ERS. At the American Beekeeping Federation conference in January, 2015, NASS asked the opinions of beekeepers who participated in pollination what sort of data would be useful for them. A draft questionnaire was then drawn up and tested on a variety of crop producers.

NASS discovered that yearly data collection in the fall, after all blooming was completed, was optimal for the majority of respondents. Originally, the questionnaire allowed respondents to write in which crops they produced, however it proved to be less burdensome and more efficient to have the majority of crops listed on the form with a few place holders for any other unspecified crops.

**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 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.

**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.**

NASS tested the questionnaire on operators with various types and varieties of crops to determine an average completion time. The finalized questionnaire was also given to trained enumerators to give their estimate on completion time for a phoned survey. The calculation of total respondent burden is shown in the table below. It was estimated that it would take five minutes to read the cover letter and internet access instructions and fifteen minutes to complete the survey. Operators who chose not to respond were allotted 2 minutes to look at the letter before deciding not to respond.

The cost to the public for completing the questionnaire (including the time to gather the necessary information) is assumed to be comparable to the hourly rate of those requesting the data. This is based on a total annual reporting time of 14,987 hours, which is multiplied by \$25 per hour for a total annual cost to the public of \$374,675.

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.

Estimate of Burden for Federal Register Notice

Estimated Annual Burden for Cost of Pollination Survey 2015 - 2017											
Survey	Sample Size	Waves of Data Collection	Responses				Non-response				Total Burden Hours
			Resp. Count	Waves x Count	Min./ Resp.	Burden Hours	Nonresp Count	Waves x Count	Min./ Nonr.	Burden Hours	
Initial Mailing of Questionnaire	50,000	1	22,000	22,000	15	5,500	28,000	28,000	2	933	6,433
Phone and Field Enumeration Follow-up	28,000	1	18,200	18,200	15	4,550	9,800	9,800	2	327	4,877
Respondent Cover Letter and Publicity Materials	50,000	1	40,200	40,200	5	3,350	9,800	9,800	2	327	3,677

**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 cost to the Federal Government for the Cost of Pollination Survey for Fiscal Year 2016 is approximately \$1,050,000. About \$887,000 is for Federal salaries (which will include the creation of a target sample, develop a questionnaire (paper, internet and computer assisted telephone interview), cognitive testing, develop an interactive editing and summary system, manual and interactive review of raw and summarized data, creation of tables and publication, training of enumerators, etc.), \$93,000 for telephone and field enumeration by National Association of State Departments of Agriculture (NASDA) enumerators, and \$70,000 for printing, postage, data processing, publications, etc.

**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).**

This is a new data collection package so all changes are due to program changes.

**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.**

Data collection for the new, annual, Cost of Pollination survey will take approximately two weeks. The analysis and summarization phase will take approximately three to four weeks. The target starting date for this first year is November, 2015, with the projected publication to be in either December or January.

**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.

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