

## Supporting Statement – Part A

### ORGANIC SURVEY OMB No. 0535 - 0249

**TERMS OF CLEARANCE:** Prior to the commencement of the Organic Survey forms distribution, the National Agricultural Statistics Service shall provide on its Internet site prominent links to directions on how to obtain a set of finalized survey forms, including instructions, cover letters, and related materials comparable to those provided for the 2007 Census of Agriculture report forms. The final forms and letters shall reflect any changes in the survey year, OMB number expiration date, and NASS or cooperating partner leadership from those submitted for review.

**REPLY:** On the NASS web homepage we have placed a link that data users can use to request any NASS questionnaire, publicity material or publication.

[http://www.nass.usda.gov/Surveys/Request\\_for\\_Survey\\_Form/index.php](http://www.nass.usda.gov/Surveys/Request_for_Survey_Form/index.php)

The National Agricultural Statistics Service (NASS) of the United States Department of Agriculture (USDA) requests approval from the Office of Management and Budget (OMB) to revise and extend the currently approved Organic Survey information collection for a period of three years.

In 2009, NASS conducted the 2008 Organic Production Survey. Originally this survey was designed to be conducted once every five years as a follow-on-survey to the Census of Agriculture. However, in 2011 the USDA Risk Management Agency (RMA) made a formal agreement with NASS to conduct a shortened version of the survey, so that they could maintain the data series timeline. Since this survey would be conducted as a reimbursable survey the reporting requirement had to be changed to voluntary. In 2015 (reference period 2014) this survey will return as a follow-on survey to the 2012 Census of Agriculture. The reporting status has been changed back to mandatory for this one year.

The target population for this census consists of all certified organic farms, farms exempt from certification, and transitioning farms. Certified organic farms must meet the qualifications set out by the Agricultural Marketing Service (AMS) of the USDA and be certified compliant by an approved agent of AMS. Farms employing organic practices according to the National Organic Program (NOP) standards but selling less than \$5,000 of organic products are exempt from certification. Transitioning farms have filed a plan and have begun the process of becoming certified organic. The Organic Survey is a census of all target population operations that indicated organic production on their 2012 Census of Agriculture form.

The Organic Survey will be conducted in all 50 States. The respondents will be given various means to report their data including use of our web-based Electronic Data Reporting (EDR) method. Operations will be contacted by mail in early January, with a second mailing in mid February to non-respondents. Telephone and personal enumeration will be used for remaining non-response follow up. NASS will publish summaries in August at the State level and for each major organic commodity when possible. Some State level data may need to be published on a regional or national level due to confidentiality rules.

## **SECTION 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 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, whole farm characteristics, and operator demographics. Timely, reliable, and detailed statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations.

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 statistics ... and shall distribute them among agriculturists."

This census of organic farmers is required by law under the "Census of Agriculture Act of 1997," Pub. Law No. 105-113, 7 U.S.C. 2204(g), as amended. These data will be collected under the authority of 7 U.S.C. 2204(a). Individually identifiable data collected under this authority are governed by Section 1770 of the Food Security Act of 1985 as amended, 7 U.S.C. 2276, which requires USDA to afford strict confidentiality to non-aggregated data provided by respondents. This Notice is submitted in accordance with the Paperwork Reduction Act of 1995, Pub. Law 104-13, 44 U.S.C. 3501, et seq. and Office of Management and Budget regulations at 5 CFR part 1320.

The information is vital to RMA in determining insurance payments to organic farmers. Further, under the 2008 Farm Bill (Public Law 110-246, Section 12023, Part D) some of the duties of the Federal Crop Insurance Corporation (FCIC) are defined as (i) IN GENERAL. The Corporation shall submit to the Committee on Agriculture of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate an annual report on progress made in developing and improving Federal crop insurance for organic crops, including (I) the numbers and varieties of organic crops insured; (II) the development of new insurance approaches; and (III) the progress of implementing the initiatives

required under this paragraph, including the rate at which additional price elections are adopted for organic crops.

The Organic Survey will also help to fulfill mandates set forth by the “Food, Agriculture, Conservation, and Trade Act of 1990” (Pub. Law 101-624) and the “Farm Security and Rural Investment Act of 2002” (Pub. Law 107-171) as amended by the “Agricultural Act of 2014” (Pub. Law 113-79).

According to the Organic Trade Association, “in 2010, the organic industry grew to over \$28.6 billion. With 7.7 percent growth during 2010, organic food outpaced the growth of total food sales, which stagnated at only 0.6 percent. Organic continues to eke out gains in total market share, climbing to 4 percent of the \$673 billion food industry in 2010.”

Food safety and nutrition concerns continue to aid legislators in establishing policies for our Nation’s food supply. Accurate measures of non-organic products used to make food have a firm foundation while there is a serious lack of information regarding the Organic sectors contribution to our food supply.

Our nation’s consumers are becoming increasingly aware of the impact that quality food has a cornerstone for overall health and quality of life. As more research and studies are conducted there will be a continuing need for an accurate account of what organic production can contribute as a supplement to our overall intake of food products.

**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 primary purpose of the Organic Survey is to provide acreage, production, and sales data for a variety of organic crop and livestock commodities as well as to gather information on organic marketing practices. These data will be provided by certified organic farms, organic farms exempt from certification, and transitional farms in all 50 States. National and State estimates (where publishable) will be set for all items that are collected on the survey.

Producers, universities, legislators, farm businesses, etc. are in need of organic production and economic data in order to make various important marketing and business decisions. The production of organic commodities can be a very profitable alternative for America’s farmers and ranchers and the information gathered will help in the continued orderly development of this expanding agricultural industry.

NASS plans to collect the following organic crop information for acreage in production, quantity produced, quantity sold, and value of sales for field crops, vegetables, fruits, tree nuts and berries. NASS plans to collect information on inventory, quantity sold and value of sales, for organic: livestock, poultry and

livestock products. In addition, NASS will collect information on the different marketing practices.

As part of the Organic Farming Initiatives, the data will be used to provide solid production and market data about the supply of key organic commodities. Presently, conventional farmers have access to various types of USDA data for non-organic commodities, while there is no long term, comparable data available for organic producers.

These data will be used to enhance programs like the Environmental Quality Incentives Program (EQIP) by providing accurate, detailed data for agricultural products produced using organic practices. Data will provide valuable information regarding the potential expansion of the Market Access Program to allow for more organic agricultural exports. The Federal Crop Insurance Corporation (FCIC) will use these data to provide better insurance coverage for organic crops.

- 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 will use an EDR instrument for soliciting responses to the Organic Survey. The 2008 Organic Production Survey, which was conducted as a follow-on survey to the 2007 Census of Agriculture and had a mandatory reporting requirement, had an 8% online response rate. The 2011 Certified Organic Production Survey which was conducted as a reimbursable survey and had a voluntary reporting statement, achieved a 2% online response rate. With the use of additional publicity materials, NASS is hoping to increase this response rate.

Follow-up telephone interviews and a limited number of face-to-face interviews will be used for data collection of non-respondent cases. NASS will utilize survey management and methodology information technology to target operations that have a higher probability of producing organic products.

- 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 Organic Survey is expected to produce reliable data, that is both current and on a national scale. The first national scale survey was conducted in 2004 and had a very low response rate. The second was conducted by NASS in 2009 for the reference period 2008. The 2011 OPS only collected data for certified producers. The 2014 Organic Survey will be more comprehensive than the 2011 survey

because it will collect data from certified organic producers, producers exempt from certification, and transitioning producers, similar to the 2009 survey.

Internal committees within USDA that include NASS, Economic Research Service (ERS), Agricultural Marketing Service (AMS), Agricultural Research Service (ARS), Cooperative State Research Education and Extension Service (CSREES), and Natural Resource and Conservation Service (NRCS) have been formed to help coordinate the different aspects of NASS data collection efforts and to eliminate the possibility of duplication of efforts. The Advisory Committee on Agricultural Statistics, appointed by the Secretary of Agriculture, also provides advice on NASS program areas; this committee is composed of a diverse representation of agricultural sector expertise.

**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.**

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. As all of our survey respondents are subjected to the same level of burden, there is no variance in the estimate of the burden across our expected group of respondents. The estimated breakout of our sample size can be found in the following table.

| Organic Census Sample Breakdown   |                      |            |
|---|----------------------|------------|
| Total Value of Products Sold  | Number of Operations | Percentage |
| \$99,999 or less  | 12,979               | 76.4%      |
| \$100,000 to \$249,999  | 2,051                | 12.1%      |
| \$250,000 to \$499,999  | 934                  | 5.5%       |
| \$500,000 to \$749,999  | 353                  | 2.1%       |
| \$750,000 to \$999,999  | 161                  | 0.9%       |
| \$1,000,000 or more   | 514                  | 3.0%       |
| Totals  | 16,992               | 100.0%     |
| Operations with less than \$750,000 in Sales - 16,317 or 96.0% of total sample. (Based on current data in the NASS List Frame.) |                      |            |

**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.**

Under the Agricultural Adjustment Act of 1938 (Pub. Law 75-430) and the Federal Crop Insurance Reform Act (Pub. Law 103-354) as amended through Public Law 113-79, enacted February 7, 2014; the Department of Agriculture Organic Act of 1944 as amended; and the Organic Foods Production Act of 1990 as amended, greater emphasis has been placed on the production and marketing of organic crops in the United States. The Risk Management Agency (RMA), the Federal Crop Insurance Corporation (FCIC), the Agricultural Marketing Service (AMS) and numerous other Federal and State agencies rely on the availability of accurate, timely organic data in order to perform their duties. Within this growing sector of farm production, less frequent data collection would greatly impair the accuracy of these other agencies work.

**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;**

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**

There were three Federal Register Notices published for this ICR. When the renewal request was initially drafted there were no census funds available for this survey. RMA was willing to pay for the survey through a reimbursable agreement, in order to support their data needs and the docket was submitted as a voluntary survey. When the current budget was approved for 2014, census funds were made available for the renewal of the organic census. NASS restarted the renewal process and submitted the second Federal Register Notice as a mandatory survey. Upon receiving a request from OMB several minor changes were made to the second notice before it being republished for a third time.

The first Notice soliciting comments was published in the Federal Register on March 17, 2014 on pages 14663 - 14664. 1Four public comments were received in response to this notice.

- National Organic Coalition – Steve Etko
- National Sustainable Agriculture Coalition – Fred Hoefner
- Organic Trade Association – Marni Karlin
- Carolyn Dimitri – New York University

The second Notice soliciting comments was published in the Federal Register on June 19, 2014 on pages 35148 – 35149. One public comment was received in response to this notice.

- Agriculture Technology Consultant – Steve Savage

The third Notice was soliciting comments was published in the Federal Register on August 19, 2014 on pages 49048 – 49050. One public comment was received in response to this notice

- Ms. Jean Public

All comments were favorable for the renewal of this collection except for Ms. Public.

**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.**

The Advisory Committee on Agriculture Statistics reviews all of the Census of Agriculture programs and provides recommendations on content, forms design, methodology, outreach, publications, etc. The Committee, appointed by the Secretary of Agriculture, consists of 25 members representing a broad range of interests, including agricultural economists, rural sociologists, farm policy analysts, educators, State agriculture representatives, agriculture-related business and marketing experts, and members of major farm organizations. The committee meets once or twice a year but frequent communication with the members is maintained; the most recent meeting was in November 2013.

Extensive correspondence and discussions took place during the fall of 2013 until the spring of 2014 with numerous representatives from RMA, OSEC, and several organic organizations regarding previous organic data collection efforts, current data availability, and questionnaire content and development. These individuals included:

- Brandon Willis (Administrator, RMA)
- Ross Heiman (Agricultural Economist, Risk Management Specialist, RMA)
- Syndnee Chattin (Director AADD, RMA)
- Betsy Rakola (Organic & Sustainable Agriculture Policy Advisor, OSEC-MRP)
- Max Holtzman (Senior Advisor to the Secretary, OSEC)
- Catherine Green (Senior Economist, ERS)
- Marni Karlin (Director, Legislative and Legal Affairs, Organic Trade Association)
- Steven Etko (Washington Representative, National Organic Coalition)
- Juli Obudzinski (Senior Policy Specialist, National Sustainable Agriculture Coalition)
- Ariane Lotti (Assistant Policy Director, National Sustainable Agriculture

Coalition)

NASS will conduct cognitive testing on fewer than 9 producers in an effort to improve response and accuracy of data reported. The number of test cases will be limited but extensive in their scope of production of organic commodities. Furthermore, NASS has solicited input from other agencies and organic associations to develop questions that will be useful to the industry in regards to operation practices, marketing, and demographics.

**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.

Minor changes were made to the wording of the pledge so that it would be consistent with NASS procedures.

**11. Provide additional justification for any questions of a sensitive nature.**



No questions of a sensitive nature are anticipated in work conducted under this clearance.

- 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.**

The time required to complete the Organic Survey questionnaire is expected to average 45 minutes per respondent. Time will vary since operations differ in size, scope of production, and practices utilized. Total number of positive responses is estimated to be 15,441, which is based on using an estimated annual sample size of 17,500 with an estimated response rate of 85 percent. The target population consists of certified organic producers, producers exempt from certification and transitional operations. Response burden hours are shown in the table below. There will be a postcard announcement sent out to the target operations announcing the upcoming survey. The next mailing to the respondents will contain the questionnaire, a cover letter, and an Electronic Data Reporting (EDR) mail Instruction sheet. For non-respondents, the follow up mailing will contain another copy of the questionnaire and a cover letter. NASS will also utilize telephone and personal enumeration to follow up with individuals who do not respond to the mail requests or via EDR.

Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 14,249 hours is multiplied by \$25 per hour for a total cost to the public of \$356,225. 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, 2013 mean wage for bookkeepers is \$17.91. The mean wage for farm managers is \$35.20. The mean wage for farm supervisors is \$22.09. The mean wage of the three is \$25.07.

| Estimated Respondent Burden for 2014 Organic Survey  |     |               |       |               |               |             |               |               |               |             |              |                    |
|--|-----|---------------|-------|---------------|---------------|-------------|---------------|---------------|---------------|-------------|--------------|--------------------|
| Survey   | 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 |                    |
| <b>Questionnaires</b>  |     |               |       |               |               |             |               |               |               |             |              |                    |
| Organic Survey 1st Mailing   |     | 17,500        | 1     | 6,125         | 6,125         | 45          | 4,594         | 11,375        | 11,375        | 2           | 379          | 4,973              |
| Organic Survey 2nd Mailing   |     | 11,375        | 1     | 2,844         | 2,844         | 45          | 2,133         | 8,531         | 8,531         | 2           | 284          | 2,417              |
| Organic Survey Follow-Up Enumeration   |     | 8,531         | 1     | 5,972         | 5,972         | 45          | 4,479         | 2,559         | 2,559         | 2           | 85           | 4,564              |
| <b>Total</b>   |     | 17,500        |       | 14,941        | 14,941        |             | 11,205        | 22,466        | 22,466        |             | 749          | 11,954             |
| <b>Publicity Materials for ALL surveys</b>   |     |               |       |               |               |             |               |               |               |             |              |                    |
| Pre-Survey Post Card   | n/a | 17,500        | 1     | 6,125         | 6,125         | 2           | 204           | 11,375        | 11,375        | 1           | 190          | 394                |
| Initial Mailing <sup>1/ 2/</sup>   | n/a | 17,500        | 1     | 6,125         | 6,125         | 8           | 817           | 11,375        | 11,375        | 2           | 379          | 1,196              |
| Follow-up Mailing <sup>1/ 2/</sup>   | n/a | 11,375        | 1     | 2,844         | 2,844         | 8           | 379           | 8,531         | 8,531         | 2           | 284          | 664                |
| <b>Total</b>   |     | 17,500        |       | 15,094        | 15,094        |             | 1,400         | 31,281        | 31,281        |             | 853          | 2,253              |
| <b>Quality Control Survey (Telephone Only) - Recontact operators to verify quality of NASDA enumerators.</b> |     |               |       |               |               |             |               |               |               |             |              |                    |
| Quality Control Worksheet OPS (phone only)   |     | 500           | 1     | 500           | 500           | 5           | 42            | 0             | 0             |             | 0            | 42                 |
| <b>Total</b>   |     | 500           |       | 500           | 500           |             | 42            | 0             | 0             |             | 0            | 42                 |
| <b>Totals</b>  |     | <b>17,500</b> |       | <b>15,441</b> | <b>21,566</b> |             | <b>12,647</b> | <b>22,466</b> | <b>22,466</b> |             | <b>1,602</b> | <b>14,249</b>      |

<sup>1/ 2/</sup> The initial and follow-up mailings will consist of the questionnaire, cover letter, EDR instruction sheet and return envelope.

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

There are no capital/startup or ongoing operation/maintenance costs associated with this information collection period.

**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 cost to the government for the Organic Survey is estimated at \$2,000,000 annually. The approximate cost breakdown is as follows: federal personnel \$1,494,000; NASDA field and phone enumerators \$100,000; and miscellaneous expenses (shipping, handling, printing, postage, travel, etc.) \$406,000.

**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).**

In 2008 the Organic Survey was conducted as a mandatory survey and was a follow-on survey to the 2007 Census of Agriculture. In 2008 we targeted certified organic producers, operations that were exempt from certification (sales less than \$5,000) and operations that were transitioning towards organic certification. In 2011 the survey was conducted as a reimbursable survey and had a voluntary response requirement. The sample was targeted at certified organic producers only. In 2015 the survey will again be conducted as a follow-on survey to the Census of Agriculture and will reinstate the mandatory reporting requirement. The target population will go back to including certified organic producers, exempt producers and transitional producers.

The increase in burden and number of respondents are the result of 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.**

Approximate annual time schedule for the Organic Production Survey:

|                             | <b>Start</b> | <b>Finish</b> |
|-----------------------------|--------------|---------------|
| Initial Mail-out            | January      |               |
| Follow-up Mailing           | February     |               |
| Telephone / Field Follow-up | March        | April         |

|                                   |        |        |
|-----------------------------------|--------|--------|
| Review, Analysis, and Summary     | April  | June   |
| Estimation                        | July   | August |
| Review Tables and Prepare Release | August |        |
| Publication Date                  | August |        |

To aid telephone and field follow-up by enumerators, each enumerator will receive an Interviewer’s Manual. To aid statisticians in the edit and analysis of reported data, Regional Field Offices will receive Survey Administration Manuals.

Results of the most recent Organic Production Survey are attached to this submission.

- 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.**

No exceptions to the Certification Statement should be required. If so, OMB approval will be requested in advance of conducting the survey.

November, 2014  
Revised December, 2014