

## **SUPPORTING STATEMENT**

### **Generic Testing – 2019 Survey of Irrigation Organizations**

**OMB No. 0535-0248**

#### **A. JUSTIFICATION**

This mini-supporting statement is being submitted to OMB to define the need for conducting qualitative research, in the form of focus groups and/or cognitive interviews, for the upcoming 2019 Survey of Irrigation Organizations, which will collect data from irrigation districts, ditch companies (“mutuals”), and groundwater districts.

The 2019 Survey of Irrigation Organizations, sponsored by the USDA’s Economic Research Service (ERS) with support from USDA’s Office of the Chief Economist (OCE), and conducted by the USDA’s National Agricultural Statistics Service (NASS), will ask questions about irrigation topics such as irrigation facilities and pumps, water sources, distribution, delivery, and storage, water rights, types of aquifers, costs, investments, debt, revenue, water conservation, and drought planning. A similar survey was last conducted in 1978, and much of the content comes directly from that data collection.

The cognitive testing will be conducted in 2019. The testing will be voluntary and will be conducted in person or on the phone. The Survey of Irrigation Organizations will be conducted in 2020 referencing the calendar year of 2019. The survey will use predominantly self-administered modes of data collection (paper and web), with limited telephone and field enumeration. Response to the survey will be voluntary.

The purpose of this research study is to conduct no more than two focus groups, and no more than 50 exploratory and cognitive interviews with contact people at irrigation organizations, as resources allow. The goals of these focus groups and cognitive interviews will be to: understand the respondents’ comprehension of questions and terminology; understand barriers to the retrieval of information requested on the questionnaire, including any record keeping practices; observe the respondents’ judgement and communication of the information requested; understand how to align responses to the question/questionnaire’s intent; glean ways to reduce respondent burden while maximizing overall response strategies; and determine the average burden time to complete the survey. Respondents for the qualitative testing will be recruited using a draft list frame being developed by ERS and OCE, and possibly the assistance of water users associations.

#### **1. Circumstances making collection of information necessary.**

The 2019 Survey of Irrigation Organizations, will ask irrigation organizations questions about the water they deliver to farms and ranches, including number of water users and acres served, sources of water, disposition of water, irrigation facilities, water storage, measuring and monitoring of aquifers, costs and expenditures, capital investments, debt, revenue, price structure, conservation efforts, and drought planning. The purpose of this research study is to conduct no more than two focus groups, and no more than 50 cognitive interviews (as resources allow) with knowledgeable contact people in irrigation organizations in order to assess respondents' understanding of the draft questions and the potential measurement error associated with these questions.

Since many of these questions have not been asked in a federal survey in over forty years, a time during which the number and structure of irrigation organizations has changed, this research is needed to evaluate the format and structure of the survey questions. The goals of this qualitative testing will be to: understand the respondents' comprehension of questions and terminology; understand barriers to the retrieval of information requested on the questionnaire, including any record keeping practices; observe the respondents' judgement and communication of the information requested, and understand how to align responses to the question/questionnaire's intent; and, glean ways to reduce respondent burden while maximizing overall response strategies.

**2. How, by whom, and for what purpose information is to be used.**

The information gathered through the qualitative research will be analyzed by NASS's Methodology Division, Census and Survey Division, and ERS to determine the changes to the format and content of the Survey of Irrigation Organizations, as well as the best way to ask questions about the constructs of interest on the survey.

The draft survey questions, along with the types of questions that will be asked during the focus group and/or cognitive interviews, is attached to this request.

**3. Use of improved information technology.**

If conducted, the focus groups will be conducted by NASS or ERS HQ staff in person. The cognitive interviews proposed would be done either in person or by telephone, by trained cognitive interviewers from either the NASS Field Offices or NASS HQ.

**4. Efforts to identify duplication.**

No additional efforts will be taken to identify duplication. Respondents who are selected for the focus groups and cognitive interviews will be selected from the list provided by ERS or by water users associations. At this time, it is not known how much duplication will be on the ERS list.

**5. Methods to minimize burden of small businesses.**

For these focus groups and cognitive interviews, no special efforts will be made to minimize burden of small businesses. Ideally, we hope to include operations of varying sizes, based on the amount of water they distribute.

**6. Consequence if information collection were less frequent.**

This is a one-time qualitative project. If resources allow, focus groups will be held in January 2019. The cognitive interview project will likely be done in two phases, one in February 2019 and a second one, if needed, in May or July 2019. The questionnaire for the survey will be used for a March 2020 mail out.

**7. Special circumstances.**

There are no special circumstances associated with this information collection.

**8. Federal register notice and consultation with outside persons.**

Not applicable.

**9. Payments or gifts to respondents.**

There are no payments or gifts to respondents.

**10. Confidentiality provided to respondents.**

The same confidentiality that is applied to the Survey of Irrigation Organizations will be applied to data collected during the focus groups and cognitive interviews. This is specified in the docket 0535-0248.

**11. Questions of a sensitive nature.**

The Survey of Irrigation Organizations may ask questions related to capital investments, revenue, and debt, which could be considered sensitive. In addition, some irrigation decisions are subject to regulation or litigation over water quantity and environmental issues. Consultation with key stakeholders and cognitive interviewers will help to identify sensitive content.

**12. Hour burden and annualized costs to respondents.**

All groups and interviews will be conducted by trained cognitive interviewers or survey methodologists who work at either NASS headquarters or one of the NASS Field/Regional Offices.

We plan to conduct a maximum of two focus groups lasting approximately two hours each, with 10 participants each, and/or a maximum of 50 one hour cognitive interviews, for a total of 90 burden hours. Cost to the public of completing the cognitive interview is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 90 hours are multiplied by \$36.66 per hour for a total cost to the public of \$3,300.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 30, 2018 for the previous May) to estimate an hourly wage for the burden cost. The May 2017 mean wage for bookkeepers was \$19.76. The mean wage for farm managers was \$38.62. The mean wage for farm supervisors was \$24.11. The mean wage of the three is \$27.50. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will be adding an additional 33% for a total of \$36.66 per hour.

**13. Total annual cost burden to respondents.**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

**14. Annualized costs to federal government.**

Costs for conducting the qualitative research interviews are estimated at \$50,000. This will cover expenses for staff payroll, travel, survey analysis, and any other expenses that may be incurred while updating survey materials based on our findings.

**15. Reasons for changes in burden.**

This mini-supporting statement addresses the use of burden to conduct testing for the Survey of Irrigation Organizations.

**16. Tabulation, analysis, and publication plans.**

No data will be published from these tests. Data are for internal use only, but results may be presented at outside conferences or seminars.

**17. Request for approval of non-display of expiration date.**

There is no request for approval of non-display of the expiration date.

**18. Exceptions to certification statement.**

There are no exceptions to the certification statement.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS:**

**1. Respondent universe, sampling, and response rate.**

NASS will use the list provided by ERS and OCE, or water users associations to identify organizations that meet the screening criteria for the Survey of Irrigation Organizations. The organizations will not be statistically sampled; rather, they will be hand selected based on their size and type. We plan to include two respondents from each type of organization listed on the questionnaire (unincorporated mutual, incorporated mutual, district, commercial company, groundwater district, and other). Also, we plan to include respondents from organizations of different sizes related to how much water the organization is responsible for distributing.

NASS HQ staff, ERS HQ staff, NASS State Statisticians, Survey Coordinators, Regional Field Office staff, NASDA staff, and water users associations may recruit respondents for the interviews.

**2. Procedures for the collection of information.**

Interviewers will follow standard pretesting techniques as defined in the original Supporting Statement Part A for the Generic Clearance docket (0535-0248).

**3. Information collected adequate for intended uses.**

Operations will be selected based on specific criteria as stated above.

**4. Test of procedures or methods.**

Not applicable.

**5. Individuals consulted on statistical aspects of survey.**

Selection of methods of testing for this qualitative research was done by the Methodology Division; Chief Cognitive Research Methodologist is Jaki McCarthy, (202) 690-2389. Senior Survey Methodologist is Kathy Ott, (202) 720-1114.

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