

**2016 SUPPORTING STATEMENT-Part A
Local Food Directories and Survey
OMB NO. 0581-0169**

Note to Reviewer: OMB 0581-0289, Local Food Directories and Survey approved by OMB on May 30, 2014 collect data from these marketing channels which are used to populate USDA’s National Community-Supported Agriculture (CSA), On-Farm Market and Food Hub Directories. Merger of OMB 0581-0289 Local Food Directories and Survey and OMB 0581-0169 National Farmers Market Directory and Survey with Modules was also approved at that time. Upon approval of this collection we will execute the merger of the two collections and rename OMB 0581-0169 to Local Food Directories and Survey.

Combining these three direct marketing channel directories with the highly successful National Farmers Market Directory website will provide synergies, give customers a one stop shopping website for a wide variety of locally produced directly marketed farm products, and provide a free advertising venue for agricultural enterprise managers seeking to diversify their farming operation by marketing directly to customers. Merging the collections will also allow for reduced response time for the growing number of agricultural enterprise managers who participate in a variety of direct to consumer and wholesale marketing channels to maximize their revenue Upon approval of this renewal collection and merge request, we will submit a discontinuation request to delete 0581-0289 Local Food Directories and Survey to prevent duplicity of burden.

Terms of Clearance: OMB appreciates that AMS is committed to providing quality, useful information to the public through the National Farmers Market Directory, and to conducting relevant and timely research on farmers’ markets through the associated survey collections. AMS agrees to sponsor a working group composed of stakeholders across the Department of Agriculture, focused on identifying efficiencies and developing the sampling methods and procedures necessary to allow these survey collections to be generalized across the population of US farmers’ markets. Until this work can be completed and approved by OMB through a revision to the clearance package, AMS agrees to not present results from these collections as Nationally representative, and to include a statement of limitations on all official publications resulting from these collections based on the limitations section in Supporting Statement Part B.

A. Justification.

- 1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.**

The primary legislative basis for conducting farmers market research is the Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627). This act broadened the scope of USDA activities to include the entire spectrum of agricultural marketing, including direct marketing. Sec. 203a of the Act states that the Secretary of Agriculture is directed and authorized, “to determine the needs and develop or assist in the development of plans for efficient facilities and methods of operating such facilities for the proper assembly, processing, storage, transportation, distribution, and handling of agricultural products...” In addition, the Farmer-to-Consumer Direct Marketing Act of 1976 supports USDA’s work to enhance the effectiveness of direct marketing, such as the development of modern farmers markets.

In line with this legislative mandate, the Local Food Research Division (LFRD) formally the Marketing Services Division (MSD) of USDA’s Agricultural Marketing Service identifies marketing opportunities and provides analysis to improve farmers markets and other direct-to-consumer marketing activities. This information is used to populate USDA’s National Farmers Market Directory, and participating market managers are invited to participate in an optional survey evaluating the farmers market sector.

Topic areas in USDA’s National Farmers Market Managers Survey include characteristics and history of farmers markets, market locations, types of products sold, number of vendors, and vendor characteristics, availability of nutrition assistance and education programs, special events, marketing methods, vendor retention and recruitment, market growth and enhancement, market contribution to economic development, and manager awareness and participation in grant and educational programs, what information farmers market managers have and how they derive estimates of the number of customers, sales, number of vendors, and vendor characteristics. The collection captures GIS coordinates which enable mapping of market locations, which provides the ability to immediately stratify the respondents and direct them to the survey modules relevant to their characteristics. The data-driven nature of the collection and the use of modules minimizes the time necessary for respondents to complete the questionnaire.

As mandated by our legislative authority, our data collection and analysis of farmers markets allow us to provide support and technical guidance to the small-to medium-sized agricultural producers who rely on farmers markets to market their products in combination with other direct to consumer marketing arrangements. In some cases markets were developed specifically to provide alternative marketing options for small and medium-sized producers moving from cash crops, allotment based marketing, and bulk commodities.

Direct marketing through the nation’s farmers markets provides an opportunity to increase the utilization of successful USDA programs, such as the Women, Infants, and Children (WIC) program, WIC Farmers Market Nutrition Program, WIC Cash Value Voucher, Senior Farmers Market Nutrition Program and the Supplemental Nutrition Assistance Program (SNAP) (formally called “food stamps”). They also provide a “teachable moment” for diet, health, and nutrition services and programs. Efforts to

enhance direct marketing opportunities supplement a continuing cross-Departmental program that endeavors to enhance fresh food access, stimulate local economic development, improve community, quality of life, and combat obesity by making fresh fruits and vegetables more accessible and affordable.

As part of its portfolio of services, AMS maintains the USDA National Farmers Market Directory, the most robust and complete database of farmers markets in the United States. It contains listings for nearly 8,500 farmers markets in the country. Beyond those data users who are directly involved in the farmers market sector, the data collected by AMS on farmers markets are widely used by community planners, public health officials and GIS research specialists to guide decisions pertaining to community quality of life and investment decisions, by software developers looking to develop popular mobile applications, and by general members of the public seeking local sources of high-quality fresh food. The growing interest in farmers market data from a broad segment of the public corresponds with unprecedented levels of demand for locally-grown foods, a steady increase in direct farm marketing nationally between 1997 and 2012, the farm gate sales value of edible farm products that were sold directly from farmers to consumers rose from \$551 million to 1.3 billion representing a 136 percent increase. Meanwhile USDA's Economic Research Service, using a broader parameter of direct and intermediated local food sales, estimated in 2012, 163,675 farmers sold an estimated \$6.1 billion in local foods.

In addition, the Farmer-to-Consumer Direct Marketing Act of 1976 supports USDA's work to enhance the effectiveness of direct marketing, such as the development of on-farm markets, community supported agriculture (CSA's), and food hubs.

These three direct to customer marketing channels comprise an integral part of the urban/farm linkage and have continued to rise in popularity, mostly due to the growing customer interest in obtaining fresh products directly from the farm. The use of these marketing channels has enabled farmers to receive a larger share of customer's food dollar.

Local Food Directory and Survey are comprised of three surveys that are used to collect the information necessary to populate three national direct to customer directories, the National Community-Supported Agriculture (CSA) Directory, the National On-Farm Market Directory and the National Food Hub Directory. The definitions of on-farm market, CSA, and food hub are listed below.

An *on-farm market* is an area of a facility affiliated with a farm where transactions between a farm market operator and customers take place. An on-farm market may operate seasonally or year-round. On-farm markets are an important component of direct marketing, adding value by offering customers a visit to the farm and the opportunity to purchase products from the people who grew them. Producers selling from the farm reduce their transportation cost and time away from their operation required to market their products directly to customers.

CSA is another type of food-production and direct marketing relationship between a farmer or network of farmers and consumers who typically purchase “shares” of the season’s harvest in advance of the growing season. The upfront working capital generated by selling shares in advance of harvest reduces the financial risk to the farmer(s) and improves their cash flow. In addition, farmers generally receive better prices for goods marketed through their CSA crops than through wholesale marketing channels. Meanwhile, consumers benefit by receiving regular (usually weekly) deliveries of fresh locally-grown vegetables, fruit, meats, eggs and/or other food items. They also benefit from the ability to directly support the economic viability of local farmers through their purchasing decisions.

Food hub is a business or organization that actively manages the aggregation, distribution, and marketing of source-identified food products, primarily from local and regional producers, to enhance the ability of small and medium-sized to access wholesale, retail, and institutional marketing channels by allowing them to meet buyer requirements and specifications through collective marketing arrangements, and thereby increase the volume of sales they are able to generate. In many cases, the use of food hubs allows small and medium-sized farm operators to obtain higher prices for their agricultural products than they would in alternative wholesale outlets because of the ability to differentiate their products on the basis of origin and other desired quality characteristics.

In combination with farmers markets, on-farm markets, CSAs and food hubs allow consumers to have greater access to a broader range of locally grown, farm fresh produce, often give farmers the opportunity to develop a personal relationship with their customers, and cultivate consumer loyalty. By providing consumers greater access to fresh fruits and vegetables, they have been influential in encouraging consumers to purchase a greater volume of fresh produce, a behavior associated with better dietary habits and health outcomes.

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.**

National Farmers Market Directory and Survey with Modules OMB 0581-0169 _

This collection (AMS form TM-6) gathers the information necessary to populate the National Farmers Market Directory and in addition, after farmers market managers have listed their market they have the option to participate in the National Farmers Market Managers Survey.

The National Farmers Market Directory currently has over 8,500 hundred markets listed. AMS gets regular requests from University researchers for annual archives of the Directory to analyze changes in the sector over time. Listing information include but is not limited to: the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. USDA's National Farmers Market Directory has been identified as one of the Departments first-move candidates to meet OMB's call for web application programming interfaces and mobile optimized services to go on line. Below is a link to this directory:

<https://www.ams.usda.gov/local-food-directories/farmersmarkets>

The National Farmers Market Managers Survey data and subsequent reports developed from survey have been utilized by various USDA agencies, State Departments of Agriculture, extension educators, industry stakeholders and trade associations, community planners, public health officials, farmer groups, and non-profit organizations to improve market operations and performance, and evaluate the impact of federal nutrition programs on farmers market sales. Below is a link this directory:

http://35.9.190.101/localfoodsystem/FarmersMarketDirectoryUpdate/fm_surveyDisclaimer.aspx?fmid=iAxt4RKgSLD8TdsKi1E%2bFw%3d%3d

Local Food Directories and Survey OMB 0581-0289 - "Merging"

This collection was created in 2014 to expand on the direct to customer marketing channels advertised by AMS. This collection contains three surveys; each survey collects the data necessary to populate three direct to customer directories. Direct to customer agricultural enterprises voluntarily list in the directories to take advantage of the free advertising. Below is a short description of each directory and a link to each of the directories website.

National CSA Directory:

The National CSA Directory currently contains 708 listings. Listing information include but is not limited to: the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. The information displayed in the listing is designed to inform and attract potential customers of this direct to customer agricultural enterprise.

<https://www.ams.usda.gov/local-food-directories/csas>

National Food Hub Directory:

The National Food Hub Directory currently contains 166 listings. Listing information include but is not limited to: the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. The information displayed in the listing is designed to inform and attract potential customers of this direct to customer agricultural enterprise.

<https://www.ams.usda.gov/local-food-directories/foodhubs>

National On-Farm Market Directory:

The National On-Farm Market Directory contains 1,338 listings. Listing information include but is not limited to: the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. The information displayed in the listing is designed to inform and attract potential customers of this direct to customer agricultural enterprise. <https://www.ams.usda.gov/local-food-directories/onfarm>

All directories mentioned above are on-line directories and the public can export each directory into an Excel spread sheet.

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.

Market managers will be informed of the availability of filling and returning this form electronically via the Internet. AMS has made every effort to gather a complete listing of e-mail addresses of farmers markets. The number of respondents that have provided AMS with e-mail addresses is 6,845 representing 80.8 percent of the 8,473 markets currently listed in USDA’s National Farmers Market Directory.

Market managers that have provided AMS e-mail addresses will be contacted directly to participate in the Directory update/National Farmers Market Managers Survey. In addition, USDA’s Agricultural Marketing Service will contact stakeholders in the farmers market community such as State Departments of Agriculture, State Farmers Market Associations, the Farmers Market Coalition (the largest national trade association of farmers markets) to announce the start of the Directory update/National Farmers Market Manager Survey and direct market managers to a web portal where market managers can list their market in the Directory and/or participate in the National Farmers Market Managers Survey.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.

No other known information collection on the U.S. farmers market industry in the public domain has the breadth of our information collection, which will attempt to reach each

farmers market manager in the country. Consequently we expect that data from this survey will be comprehensive enough to carry out national analysis, as well as reliable regional and scale comparisons.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE 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. We estimate that 100 percent of farmers markets are classified as small businesses.

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.

Previous research studies undertaken by LFRD have been utilized by various USDA agencies, State Departments of Agriculture, extension educators, industry stakeholders and trade associations, community planners, public health officials, farmer groups, and non-profit organizations. Without this study both governmental and non-governmental organizations who contact our agency frequently for objective national and regional information on farmers markets would be deprived of a strategic marketing resource that facilitates effective planning, business development, resource allocation and policy formulation in the rapidly growing and evolving direct farm marketing sector. The compilation of a robust national database on farmers market activities allows for in-depth analysis of farmers market performance and operations by region and size of operation, and provides essential guidance to market stakeholders at all stages of business development, as well as to policymakers who seek to support the expansion of farmers market activities.

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;**
- **REQUIRING RESPONDENTS TO PREPARE A WRITTEN RESPONSE TO A COLLECTION OF INFORMATION IN FEWER THAN 30 DAYS AFTER RECEIPT OF IT;**

- **REQUIRING RESPONDENTS TO SUBMIT MORE THAN AN ORIGINAL AND TWO COPIES OF ANY DOCUMENT;**
- **REQUIRING RESPONDENTS TO RETAIN RECORDS, OTHER THAN HEALTH, MEDICAL, GOVERNMENT CONTRACT, GRANT-IN-AID, OR TAX RECORDS FOR MORE THAN 3 YEARS;**
- **IN CONNECTION WITH A STATISTICAL SURVEY, THAT IS NOT DESIGNED TO PRODUCE VALID AND RELIABLE RESULTS THAT CAN BE GENERALIZED TO THE UNIVERSE OF STUDY;**
- **REQUIRING THE USE OF A STATISTICAL DATA CLASSIFICATION THAT HAS NOT BEEN REVIEWED AND APPROVED BY OMB;**
- **THAT INCLUDES A PLEDGE OF CONFIDENTIALITY THAT IS NOT SUPPORTED BY AUTHORITY ESTABLISHED IN STATUE OR REGULATION, THAT IS NOT SUPPORTED BY DISCLOSURE AND DATA SECURITY POLICIES THAT ARE CONSISTENT WITH THE PLEDGE, OR WHICH UNNECESSARILY IMPEDES SHARING OF DATA WITH OTHER AGENCIES FOR COMPATIBLE CONFIDENTIAL USE; OR**
- **REQUIRING RESPONDENTS TO SUBMIT PROPRIETARY TRADE SECRET, OR OTHER CONFIDENTIAL INFORMATION UNLESS THE AGENCY CAN DEMONSTRATE THAT IT HAS INSTITUTED PROCEDURES TO PROTECT THE INFORMATION'S CONFIDENTIALITY TO THE EXTENT PERMITTED BY LAW.**

There are no special circumstances. Data collection plans are consistent with 5 CFR 1320.6

- 8. IF APPLICABLE, 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. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.

The agency published a notice in the Federal Register on 20th, January 2016, Vol. 81, No. 12, page 3094 and 3095, requesting an extension of and revision to a currently approved information collection, collection merger and a request for comments. AMS received 2 comments from National Agricultural Statistics Service (NASS). NASS comments and the AMS responses to the comments are included in a supplemental document.

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.

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS -- EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

AMS has consulted with David Hancock of USDA's National Agricultural Statistical Service to review the survey questionnaire for statistical soundness of the study. The following reviewers were asked to critique the questionnaire for clarity, relevance and if the results of the study would be beneficial to the farmers market sector.

Carlos Coleman
USDA
202-350-5707

Jeff O'Hare
USDA
202-756-2575

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts are provided to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

Individual questionnaires will be used for internal purposes and only summary reports will be released to the public.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

Two questions ask farmers market managers to estimate the percentage of their producers/vendors that belong to specific racial categories and ethnic groups. These questions are being asked to determine if various ethnic communities are being adequately served by the farmers market in their local area and to determine the degree that minorities farmers participate in farmers markets and are able to use farmers markets to generate farm income. These questions comply with OMB Federal Regulation V62 #210, pp. 58781-58790.

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. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL**

RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.

- 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.

It is estimated that it will take 22 minutes to complete the National Farmers Market Directory listing and the National Farmers Market Managers survey questionnaire. The estimated amount of time to complete the Directory listing is 8 minutes for market managers listing in the Directory for the first time (those that have previously participated would use less time because they would be able to access a largely pre-populated form). The market managers who opt to take the National Farmer Market Manager Survey are estimated to need an additional 14 minutes to complete the survey questionnaire. Time estimates for completed National Farmers Market Directory listing survey is based on the average time that market managers took to list their market; the time estimate for completion of the National Farmers Market Managers Survey was estimated by staff based on previous experience administering similar surveys. Analysis will be undertaken of those managers who decline to complete the survey to determine the characteristics of the farmers markets that did not respond and to measure potential non-response bias. The questions in the Directory update that will be used to evaluate non-response bias are questions 3, 12, 13, 18 and 22. We estimate that it takes 4 minutes to answer these questions.

Combining the National Farmers Market Managers Survey with the annual update of USDA's National Farmers Market Directory has improved the response rate of the National Farmers Market Manager Survey (because manager interest in posting their market information in the Directory database is so popular) To minimize respondent burden, the core section of the survey, which would be administered on an annual basis, has been shortened, and other existing questions have been incorporated into a rotating group of targeted modules that would be asked on a less frequent schedule. Burden for the National Farmers Market Directory and USDA's National Farmers Market Managers Survey is estimated to be 832.5 hours.

Local Food Directory and Survey is a collection of three surveys. The data collected by these surveys populate three direct to customer directories the National CSA, National Food Hub and National On-Farm Market Directories.

AMS burden estimates for USDA's National CSA, On-Farm Market, and Food Hub directories which will be merged into this collection are as follows:

AMS estimates that the number of on-farm markets in the U.S. is approximately 50,000 and that 1,000, (two percent), of the operators of these markets will voluntarily choose to list their operations in USDA's On-Farm Market Directory.

AMS estimates that the number of CSA's in the U.S. is approximately 6,500 and that 1,000, (15.38 percent), of CSA operators will voluntarily choose to list their operation in USDA's CSA Directory.

AMS estimates that the number of food hub operations in the U.S. is approximately 250 and that 125, (50 percent), of food hub operators will voluntarily choose to list their operation in USDA's Food Hub Directory.

Time estimates to complete the on-farm market directory, CSA directory and the food hub directory questionnaires are 10 minutes. Total burden for this study is estimated to be 355 hours.

Total burden hours for the merged collection are estimated at:

$832.5 \text{ hours} + 355 \text{ hours} = 1,187.5 \text{ hours}$

The estimated cost incurred for the National Farmers Market Directory and USDA's National Farmers Market Managers Survey (NFMD & NFMMS) is:

$1,500 \times .067 \text{ hour} \times (\$21.58 = \$2,169$ Non-response questions for market managers that choose not to respond to the farmers market survey, plus

$2,000 \times .133 \text{ hour} \times (\$21.58 = \$5,740$ (Respondents to the USDA National Farmers Market Directory update, managers that choose to complete farmers market questionnaire), plus

$2,000 \times .233 \text{ hour} \times (\$21.58 = \$10,056$ (Respondents to the USDA National Farmer Market Manager Survey)

Subtotal Cost for NFMD & NFMMS = \$17,965

The estimated cost incurred for the on-farm market, CSA, and food hub directories (OFMD, CSAD and FHD) is:

$1,000 \times .167 \text{ hour} \times \$21.58 = \$3,604$ respondents to the on-farm market directory listing questionnaire, plus

$1,000 \times .167 \text{ hour} \times \$21.58 = \$3,604$ respondents to the CSA directory listing questionnaire, plus

250 X .167 hour X \$21.58 = \$901 respondents to the food hub directory listing questionnaire

Subtotal Cost for OFMD, CSAD and FHD = \$8,109

Merged Cost of Local Food Directories and Survey = \$26,074

This calculation was based on the median wage rate for occupation code 45-1011 (First-Line Supervisor/Managers of Farming, Fishing and Forestry Workers) reported by the Bureau of Labor Statistics (\$21.58 per hour). All questions asked in the questionnaire refer to data that market managers can be expected to have ready access to as part of their normal routine.

13. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORD KEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COST OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

- **THE COST ESTIMATE SHOULD BE SPLIT INTO TWO COMPONENTS: (a) A TOTAL CAPITAL AND START-UP COST COMPONENT (ANNUALIZED OVER ITS EXPECTED USEFUL LIFE); AND (b) A TOTAL OPERATION AND MAINTENANCE AND PURCHASE OF SERVICES COMPONENT. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**
- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION**

SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

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

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

The projected cost estimate for the survey is \$15,375, a \$70,761 decrease from the 2013 survey. Changes in the projected cost reflect a decrease in IT programming required. Forms and questionnaire have not been changed since the collection's last approval and e-authorization procedures are not pursued in this proposed collection, therefore there is no need to itemize expenses associated with e-authorization IT programming. Reductions in IT programming time requirements outweighed increased hourly wage rate, resulting in lower expenditures overall. An itemization of the cost is below.

Cost of Cooperative Agreement and USDA Personnel	Cost Estimate
Develop a database of email addresses for CSA's on-farm markets and mobile markets.	\$3,000
Send 2016 email alerts, announcements and reminders to, on-farm markets, mobile markets, and CSAs, answer questions, solve technical issues, and send weekly reports to USDA	\$7,000
Oversight of Cooperative agreement by LFRD staff	
20 percent of the salary of GS 13, Step 6 for 3 months (\$107,505 x .25 x 0.20)	5,375
Total	15,375

15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

Combining the On-Farm Market, CSAs and Food Hub Directories with the highly successful National Farmers Market Directory collection provides synergies, give customers a one stop shopping website for a wide variety of locally produced directly marketed farm products, and provide a free advertising venue for farm operators seeking to diversify their farming operation by marketing directly to customers.

OMB 0581-0289 Local Food Directories and Survey was created in 2014 to expand the free advertisement of direct to customer agricultural enterprises beyond farmers markets to include CSA's, On-Farm Markets and Food Hubs. The estimated burden hours required to collect the information to populate these three additional directories is 355 hours.

OMB 0581-0169 National Farmers Market Directory and Survey with Modules collects information necessary to populate the National Farmers Market Directory and allows market managers to participate in the National Farmers Market Managers Survey. The estimated burden hours for this collection are 832.5 hours. If approved we plan to merge the two collections into OMB 0581-0169 and rename it Local Food Directories and Survey. The estimated burden hours for the merged collection are 1,187.4 hours.

Merging the collections will allow for reduced input time for the growing number of agricultural enterprise managers who participate in a variety of direct to consumer and wholesale marketing channels to maximize their revenue.

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 will be exported into SPSS and summarized. Summarized data will be published in USDA research reports and shorter technical articles. Information will be distributed externally. Summary statistical reports and cross tabulation reports will be prepared to examine the differences in data responses across regions, size, years of operation and comparisons will be made to identical data collected in previous years. The projected timeline for this project is as follows.

Dissemination of survey questionnaire	March 2017
Completion of data collection	June 2017
Data analysis complete	September 2017
Draft report completed	May 2018
Report released	September 2018

Data reported will preserve the confidentiality of respondents. The report will be distributed as a published report and published on the LFRD website.

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.

The agency plans to print the expiration date of OMB approval of the information collection on all instruments.

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.