

1Supporting Statement

2015-2016 CENSUS OF AGRICULTURE CONTENT TEST

OMB No. 0535-0243

A. JUSTIFICATION

This submission is for the reinstatement of the Census of Agriculture Content Test, which is conducted every five years prior to the full Census of Agriculture. The last content test was done in 2010 in preparation for the 2012 Census of Agriculture.

- 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 purpose of this content test is to evaluate factors impacting the National Agricultural Statistics Service's Census of Agriculture program. Such factors include, but are not limited to, response burden, questionnaire format and design, Internet instrument performance, and question wording. The proposed data collection instruments and other materials (contact card, cover letter, instruction sheet, and postcard reminder) will be used in a test in 2015-2016 in preparation for the 2017 Census of Agriculture. The full Census of Agriculture is required by law under the "Census of Agriculture Act of 1997," Pub. L. No. 105-113 (7 U.S.C. 2204g). It is the primary source of detailed State and county data that provide benchmark information for the agricultural sector. Testing is needed to measure respondents' abilities to comprehend the questions as worded and provide the intended data before introducing the full Census of Agriculture. Compared with the 2012 Census of Agriculture, most changes are expected to be wording changes and reordering of some questions to address reporting problems, as well as some content changes. Response to the 2015-2016 Census of Agriculture Content Test is voluntary.

- 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 Census of Agriculture Content Test is conducted prior to the Census of Agriculture. It is designed to evaluate a number of factors affecting the Census of Agriculture program, such as report form format and design, Internet report form design, new content items, changes to question wording, respondent burden, attitudes affecting response, selected processing procedural changes, improved usage of screening questions to improve the flow of the questionnaire

(resulting in reduced respondent burden and improved data quality), and changes in respondent reporting which may lead to misclassification of a farm (i.e., farms reporting as non-farms and non-farms reporting as farms). NASS will analyze the results of the test to identify modifications to incorporate into the final design of the 2017 Census of Agriculture data collection tools, data collection strategies, and processing methodologies.

- 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 provides the option of Internet-based reporting for all information collections, for which it is practical. The mail out Census of Agriculture Content Test will have an Internet version available. During some of the cognitive interviews and usability interviews, in addition to the scripted probes, respondents will be asked if they plan to use the internet to respond to the 2017 Census of Agriculture and if not, why not? The cognitive interviewers will make notes of any suggestions the respondents make on items NASS could make improvements on, to make our Internet version more user friendly.

- 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.**

Data and evaluative information obtained from the Census of Agriculture Content Test are not available elsewhere.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

Although the actual Census of Agriculture is required by law, all phases of this test collection are voluntary. Every effort will be made to minimize burden. This Content Test will include testing of both paper forms and an Internet-based form. The flexibility of an Internet-based form will allow operations reporting on-line to skip sections of the form which do not apply to them. In addition, this Content Test will include testing a condensed paper form, designed for agricultural operations that produce a limited number of commodities. To the extent possible, operations targeted for regular NASS surveys will be excluded from the Content Test. Respondents will be permitted to use estimates if records are not available, or precise figures are unknown. A toll-free telephone help line will be available to aid in reporting.

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.

The Census of Agriculture is required by law every five years; the Census of Agriculture Content Test is conducted approximately two years before the full census. Eliminating this testing or doing it less frequently would permit reporting problems already identified to remain in future administrations of the Census of Agriculture. The following four examples were observed during Census content testing.

Acreage/Land – Respondents are asked about the land they operate and the way that land is used on the first two sections of the questionnaire. The total numbers on these pages should be the same, but they often are not. The 2012 form did improve on this from the 2007 form, but the numbers were still different for 16% of the unedited in-scope cases. By using breakouts of the land rented from others, moving the check question for the first section to immediately following the TOTAL, simplifying the wording of the check question immediately following the TOTAL in the second section, and moving some questions off of the first page, we hope to draw more attention to the accuracy of the two boxes.

In addition to the total acres, cropland acres were often misreported on the Census. A question was added to Section 1 on Total cropland to try to assess the misreporting in Section 2.

In the Type of Organization section, many respondents answered “yes” to multiple answer categories when asked “In 2012, what was the operation’s legal status for tax purposes? Mark one answer only.” with categories of Family or Individual operation, Partnership operation, Incorporated under state law, and Other. We changed the formatting for that question to make the categories more distinct.

Women and Beginning Farmers – USDA believes that women and beginning farmers are being underreported on the Census of Agriculture. Therefore, the Expert Panel on Federal Statistics Women and Beginning Farmers recommended several changes to the Operator/Personal Characteristics questions. The cognitive interviews and mailout test will allow us to determine whether respondents can answer the new and re-worded questions accurately and completely.

Omitting this testing would hinder NASS’s ability to adequately evaluate and reduce changes considered necessary to improve future Censuses of Agriculture. Ultimately, this would jeopardize the Nation’s ability to recognize changing trends in agriculture.

- 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;...**

There are no special circumstances associated with this information collection.

- 8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

The Notice soliciting comments on this information collection was published in the Federal Register on March 19, 2015 on pages 14358-14359. No public comments were received.

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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

NASS held meetings with data users and contacted Federal and State agencies that use Census of Agriculture statistics to evaluate their data needs and to solicit recommendations and justifications on content for the 2017 Census of Agriculture. The proposed Census of Agriculture content was designed on the basis of recommendations received from Federal Government agencies; State departments of agriculture; land-grant universities and colleges; other State agencies; agricultural organizations; the Advisory Committee on Agriculture Statistics; the Expert Panel on Federal Statistics Women and Beginning Farmers in U.S. Agriculture; and The Council on Food, Agricultural and Resource Economics (CFARE). Members of the public were also invited to make recommendations for Census of Agriculture content through an on-line submission form accessible on the NASS public website.

The Advisory Committee on Agriculture Statistics is an important contact with data users outside the Federal Government. It meets on a regular basis and makes recommendations regarding all areas of the Agency's agricultural statistics program, with a special focus on the Census of Agriculture. The Committee advises the Agency on current and future data needs, the ability (or willingness) of respondents to supply the desired information, general data collection methods, content and format of Census of Agriculture and survey report forms, and publicity. The Committee evaluates requests from users as to

priority and respondent burden. (The listing of committee members is attached to this submission.)

The Expert Panel on Federal Statistics Women and Beginning Farmers in U.S. Agriculture was organized by the National Institute of Statistical Sciences (NISS) and consisted of 13 survey and agricultural experts from academia, government, and groups representing agricultural producers. The panel met in Washington, DC on April 2 and 3, 2015 to discuss what data are currently available and what data are needed on the subjects of women and beginning farmers. Following the meeting, the Panel provided their recommendations on additional information to be collected in the Census of Agriculture. A full report with detailed recommendations for the Census of Agriculture and other NASS data collections is expected in September, 2015. . (The listing of committee members is attached to this submission.)

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to sampled operations or 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.

The questions on race and ethnicity comply with the OMB Standards for the Classification of Federal Data on Race and Ethnicity.

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.

The table below shows estimates of the amount of time needed to complete the report forms based on results from the last Census of Agriculture Content Test. Estimates of the non-farm response are based on re-contacts made during the 2012 Census of Agriculture.

Reporting time of 42,552 hours is multiplied by estimated \$25 per hour for a total cost to the public of \$1,063,800.

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.

Projected Response Burden Hours for Census Content Testing											
	Sample Size	Freq.	Response				Non-response				Total Burden Hours
			Count	Freq. x Count	Min/ Resp.	Burden Hours	Count	Freq. x Count	Min./ Non Resp	Burden Hours	
PHASE ONE - Mail Test (mail late Dec 2015 or early Jan 2016) Long Form											
Pre-survey announcement letter	1,000	1	300	300	4	20	700	700	2	23	43
1st Mail Out - Respond by paper	40,000	1	4,200	4,200	60	4,200	35,800	35,800	2	1,193	5,393
1st Mail Out - Respond by internet		1	4,000	4,000	35	2,333	31,800	31,800	2	1,060	3,393
2nd Mail Out - Respond by paper	31,800	1	3,600	3,600	60	3,600	28,200	28,200	2	940	4,540
2nd Mail Out - Respond by internet		1	3,200	3,200	35	1,867	25,000	25,000	2	833	2,700
Post Card Reminder - Respond by paper	25,000	1	1,300	1,300	60	1,300	23,700	23,700	2	790	2,090
Post Card Reminder - Respond by internet		1	700	700	60	700	23,000	23,000	2	767	1,467
Phone Follow Up	23,000	1	6,837	6,837	60	6,837	16,163	16,163	2	539	7,376
Publicity Materials	71,800	1	7,800	7,800	5	650	64,000	64,000	2	2,133	2,783
Mail Test Totals Long Form	40,000		23,837	24,137		21,507	16,163	104,563		8,278	29,785
PHASE ONE - Mail Test (mail late Dec 2015 or early Jan 2016) Short Form											
1st Mail Out - Respond by paper	10,000	1	1,000	1,000	35	583	9,000	9,000	2	300	883
1st Mail Out - Respond by internet		1	1,000	1,000	35	583	8,000	8,000	2	267	850
2nd Mail Out - Respond by paper	8,000	1	900	900	35	525	7,100	7,100	2	237	762
2nd Mail Out - Respond by internet		1	700	700	35	408	6,400	6,400	2	213	621
Post Card Reminder - Respond by paper	6,400	1	300	300	35	175	6,100	6,100	2	203	378
Post Card Reminder - Respond by internet		1	200	200	35	117	5,900	5,900	2	197	314
Phone Follow Up	5,900	1	1,720	1,720	35	1,003	4,180	4,180	2	139	1,142
Publicity Materials	18,000	1	1,900	1,900	5	158	16,100	16,100	2	537	695
Mail Test Totals Short Form	10,000		5,820	5,820		3,552	4,180	26,380		2,093	5,645
PHASE TWO - Cognitive Interviews (conducted post Mail Test and/or post Internet Test)											
Round 1	200	1	160	160	120	320	40	40	5	3	323
Round 2	200	1	160	160	120	320	40	40	5	3	323
Cognitive Interview Totals	400		320	320		640	80	80		6	646
PHASE THREE - Internet Test (mail late Dec 2015 or early Jan 2016)											
1st Mail Out	15,000	1	3,750	3,750	35	2,188	11,250	11,250	2	375	2,563
2nd Mail Out	11,250	1	2,250	2,250	35	1,313	9,000	9,000	2	300	1,613
Post Card Reminder	9,000	1	1,500	1,500	35	875	7,500	7,500	2	250	1,125
Publicity Materials	26,250	1	6,000	6,000	5	500	20,250	20,250	2	675	1,175
Internet Test Totals	15,000		7,500	7,500		4,876	7,500	27,750		1,600	6,476

- 13. Provide estimates 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 estimates 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.**

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 (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

Total Content Test costs are estimated at \$ 3.2 million. These costs are included in the 2017 Census of Agriculture appropriations for fiscal year 2015 and the planned budgetary requests for fiscal years 2016 and 2017.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I (reasons for changes in burden).**

Since the Census of Agriculture Content Test information collection is a reinstatement, there is no current inventory of burden hours. The previous collection, however, had 35,450 respondents and 21,588 burden hours, compared to the current request of 65,400 respondents and 42,552 burden hours. The sample size was increased to allow for additional panels (in the main portion of the test) and to ensure greater reliability of test results. Additional sample is also needed for an Internet-only test. The increase in burden is also associated with the inclusion of burden for the publicity materials and a projected increase in positive responses.

- 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.**

The results of the test are not intended for general publication, but rather will result in summary and research reports for internal use only. The material will be evaluated as to methods to improve data collection methods, question wording, and processing of the 2017 Census of Agriculture.

Timetable for the 2015-2016 Census of Agriculture Content Test

Planning and Development	July 2014 – Dec 2015
Cognitive and Usability Testing (as needed). (Conducted under OMB # 0535-0248)	July 2015 – Nov 2015
Mail out Test (Phase 1).....	Dec 2015 - Mar 2016
Evaluate Mail out Test.....	Apr 2016 – Jun 2016
Follow-up Cognitive Testing (Phase 2, Round 1).....	Apr 2016 – Nov 2016
Internet-Only Test (Phase 3).....	Dec 2016 - Mar 2017
Evaluate Internet-Only Test.....	Apr 2017 – Jun 2017
Follow-up Cognitive Testing (Phase 2, Round 2).....	Apr 2017 – Sep 2017
Finalize Plans for 2017 Census of Ag.....	Jul 2017 – Sep 2017

- 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.

June 2015
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