

1 Supporting Statement

MINK SURVEY

OMB No. 0535-0212

A. JUSTIFICATION

NASS asks for an extension of 3 years to the ongoing annual data collection and publication of Mink data. One additional question was added to the producer's questionnaire asking for either total price of pelts sold or average price for pelts sold.

- 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 function of the National Agricultural Statistics Service (NASS) is to prepare and issue official state and national estimates of crop and livestock production, disposition, and prices. Mink figures are a basic part of the NASS strategic plan to cover all agricultural receipts. There is no other accurate source for this type of information. Before 1970, sporadic efforts were made within the industry to obtain information. The results were fragmentary, with limited response, and the findings were inconclusive. Therefore, Congress directed NASS to conduct the first Mink Survey in 1970 and the agency has conducted a survey every year since then. Figures on mink production are published for the 12 major states that account for over 90 percent of the total U.S. pelt production; estimates for the remaining states are published in a combined "Other States" category. In 2017 US producers sold nearly \$120 million dollars, worth of pelts.

General authority for these data collection activities is granted under U.S. Code, Title 7, Section 2204. This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collecting of statistics ... and shall distribute them among agriculturists."

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The mink program consists of two surveys: An annual census of all known mink producers in the 50 states (the Mink Survey) and an annual survey of the prominent mink pelt auction houses (the Mink Price Survey). Response to both surveys is voluntary. Data from the Mink Survey is used by NASS to estimate the

number of mink pelts produced and the number of females bred to produce kits the following year, by color class. Data from the Mink Price Survey is used to calculate an average market price. Total value of pelts produced is derived by combining data from the two surveys.

This data is disseminated by NASS in the *Mink* report and is used by the U.S. Government and other groups as described below.

Federal Government: The USDA's Economic Research Service (ERS) uses the data to help determine total value of sales and total cash receipts from agriculture at the state and U.S. levels. The Commerce Department's Office of Consumer Goods uses the report to answer inquiries from Congress. The Foreign Agricultural Service (FAS) which administers the targeted Export Assistance Program authorized by the Food Security Act of 1985 finds the annual *Mink* production report very useful because most of the U.S. mink production is exported. The report provides FAS marketing specialists data on the availability of pelts when working with the industry to promote pelt exports, detects trends in the U.S. mink industry relative to other supply sources, provides a basis for projecting future availability, and provides information to respond to inquiries from other government agencies and commercial traders.

State Governments: State Departments of Agriculture in Idaho, Illinois, Iowa, Michigan, Minnesota, Montana, Ohio, Oregon, Pennsylvania, Utah, Washington, and Wisconsin utilize information from this report to administer voluntary fur farm licensing programs, determine total income from agriculture, provide an indicator for fish and meat animal products, administer health regulations for mink, and refute the misconception that most mink fur comes from trapping.

States included in the "Other States" category in the *Mink* report are Indiana, New Hampshire, New Jersey, New York, North Carolina, South Dakota, and Virginia.

Farmers: Mink produce kits (offspring) once a year, which means farmers must plan years in advance for the size of their future operations and color of mink they will raise. The *Mink* report gives production totals by color class so that breeders know how many kits of each color were produced in the preceding year and how many females were bred to produce kits of each color in the current year. Over-production within a color can result in flooding the market and reduced returns to growers. With the *Mink* report, individual farmers can make better informed decisions.

Agribusiness Suppliers: The suppliers of animal feed, building materials, and other goods utilize the *Mink* report to anticipate the total requirements in each category and subcategory of products. The U.S. mink industry consumes millions of dollars' worth of fish and fish byproducts, dairy products and dairy byproducts, poultry, and meat byproducts each year. Animal health product

manufacturers can anticipate vaccine and other product requirements by studying data in the *Mink* report.

American Agri-Women: This is a national farm women's advocacy organization for Agriculture. The group takes an interest in the fur farming industry's contribution to the overall agricultural economy at the national level, especially as it relates to animal rights issues.

Importance to the Fur Industry: The industry association, Fur Commission USA, uses the information from this program to build and update industry information which is crucial for the Commission to be effective. Cooperative marketing organizations within the mink farming industry rely on NASS' statistics in planning their promotional budgets and campaigns. Employers in the dressing (tanning) trade, brokers and other intermediate merchants, fur garment manufacturers and retailers, and fur trade union groups utilize the annual *Mink* report in planning their capital expenditures, labor requirements, and other business decisions.

Animal Rights Groups and Others: Animal Rights groups use the statistics published in the *Mink* report. They make frequent telephone calls to the USDA to inquire about pelt production, in particular. Foreign interests also use the *Mink* report.

- 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.**

Web-based data reporting is available for the Mink Survey. Less than 1 percent of the respondents take advantage of this technology.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The National Agricultural Statistics Service cooperates with state departments of agriculture and land grant universities to conduct agricultural surveys. The surveys meet both state and federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Mink list building includes checks for duplication.

- 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.**

The information requested can be provided with a minimum of difficulty from normal operating records. Approximately 96 percent of mink operations in the sample are small businesses (as defined in the Small Business Administration's Table of Small Business Size Standards:

https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf.

- 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.**

Conducting this program less frequently than annually would eliminate data needed to keep federal and state agencies, agribusiness suppliers, the fur industry, and other data users abreast of changes within this industry and would erode NASS' list frame.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5 CFR 1320.5.**

There are no special circumstances associated with this data collection.

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

The Federal Register Notice soliciting comments was published on July 2, 2018, on pages 30911 - 30912. There was one public comment from Ms. Jean Public which is attached to this renewal docket.

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.

The Fur Commission USA reviews and recommends changes to the questionnaire. During the 2015 Mink Survey a new color class ("palomino") was added to questionnaire at the request of the commission.

The Fur Commission usually provides a letter of support for the survey encouraging mink producers to respond. The Fur Commission's endorsement continues to be a contributing factor to the high response rates achieved during the survey.

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 confidential. U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Public Law 107-347, Title V (CIPSEA) provide for 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 employees and NASS contractors comply with the OMB implementation guidance document, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA)." CIPSEA supports NASS's 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 confidentiality pledge statement will appear on all NASS questionnaires.

The information you provide will be used for statistical purposes only. Your responses will be kept confidential and any person who willfully discloses ANY identifiable information about you or your operation is subject to a jail term, a fine, or both. This survey is conducted in accordance with the Confidential Information Protection provisions of Title V, Subtitle A, Public Law 107-347 and other applicable Federal laws. For more information on how we protect your information please visit:

<https://www.nass.usda.gov/confidentiality>.

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

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I. Provide estimates of annualized cost

to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Burden hour calculations are shown below. The minutes-per-response figures come from cognitive interviews. 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 87 hours is multiplied by \$36.66 per hour for a total cost to the public of \$3,189.42.

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.

Estimated Sample Sizes and Respondent Burden for 2018 - 2020											
Survey	Sample Size	Waves of Data Collection	Response				Non-response				Total Burden Hours
			Count	Waves x Count	Min./ Resp.	Burden Hours	Count	Waves x Count	Min./ Non-r	Burden Hours	
Mink Survey - First Mailing	350	1	140	140	10	23	210	210	2	7	30
Mink Survey - Second Mailing	210	1	65	65	10	11	145	145	2	5	16
Follow-up Enumeration	145	1	75	75	10	13	70	70	2	2	15
Mink Price Survey	2	1	2	2	30	1	0	0	2	0	1
Publicity Materials	350	1	280	280	5	23	70	70	2	2	25

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

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

14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

The cost to the Federal government for the annual Mink Program is \$130,000. Most of the cost is personnel cost for data collection; the remainder is for supplies, postage, computer processing, and similar items.

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).

The expected burden is 87 hours, down 2 hours from the previous approval. For the Mink Survey, NASS will continue to do two mailings with either a phone or personal visit to collect the data from non-respondents, allowing NASS to continue to attain satisfactory response rates while minimizing costs. The adjustments to the number of responses and burden hours are due to a correction for the underreporting of respondents who refused multiple times (mail and phone attempts).

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.

Questionnaires are initially mailed in late April or early May. If needed a second mail request is sent in mid-May to non-respondents. Remaining non-respondents are telephoned in late May or early June. In cases where producers cannot be reached by telephone, personal contacts are made during the last week of May. For the Mink Survey, respondents have the option to report via a web-based questionnaire throughout the entire data collection period.

All data are analyzed for unusual values. Reported data from each operation are compared to what that operation previously reported, as well as to data from similar operations. Partial missing data for operations can be accounted for on an individual basis through phone follow-up with the operation, contacts with county agents or other informed persons, or imputation based on historical data

or reported data from similar operations. Complete non-responses are accounted for by expanding reported data from similar operations.

Mink Survey data are initially summarized by state, then state recommendations, comments, and previous year revisions are sent from NASS regional field offices to NASS headquarters in Washington, D.C. NASS statisticians meet for an Agricultural Statistics Board to do a final analysis of the data, including prices from the Mink Price Survey, and produce final estimates at the state and national levels. Those estimates are published in the *Mink* report, which is released in late July. Respondents who indicated on their questionnaire that they would like to receive the survey results are mailed a copy.

NASS' *Mink* reports can be found here:

<http://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1106>.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

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

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.**

There are no exceptions to the certification statement.

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