

**UNITED STATES DEPARTMENT OF AGRICULTURE**  
**Acreage/Crop Reporting Streamlining Initiative**  
**OMB NUMBER: 0563-0084**

Terms of Clearance:

Prior terms of clearance apply: The agency is encouraged to continue conducting usability testing of the instruments and consultations with stakeholders to improve the web-based tool, reduce costs, and encourage a seamless transition. Any changes that are made to the form of interaction (except for adding content) may be submitted for approval as a non-material change to the collection. The agency must also ensure that the burden currently approved for this collection in other packages is removed from those packages. They must also provide a summary of the estimated net change in burden as soon as possible, but no later than the due date for the agency submission for the ICB.

Agency Response:

The burden hours, responses, and the number of respondents have changed in this request due to PRA exemption for FSA producers and new participants added to RMA or FSA but it is one collection just for ASCRI. FSA and RMA information collection requests will be not be removed because the burden hours are included in this information collection request because of our common and shared reporting information from producers to FSA and RMA and just for ASCRI purpose. Once ASCRI is fully implemented, we will remove the burden hours from FSA (0560-0175) and RMA collection (0563-0053). ACRSI is continuing to expand but has not yet been fully implemented for all crops. Therefore, the FSA (0560-0175) information request (ICR) still includes the burden for the acreage reporting. For ACRSI, this ICR focuses on the additional time required for customers to report RMA specific information after reporting their information to FSA.

Purpose:

To request a three-year renewal approval from the Office of Management and Budget of the currently approved package.

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 Acreage/Crop Reporting Streamlining Initiative (ACRSI) is an initiative to improve and streamline the existing information collection activities currently approved by OMB by eliminating or minimizing the duplication of information collected. The improvements and streamlining continue to reduce the overall burden on the public, USDA employees, and Approved Insurance Providers (AIPs) by eliminating the need for farmers and ranchers to report the same information multiple times and eliminate the

need for USDA employees, AIPs and insurance agents to input the same data multiple times, thus reducing USDA administrative and operating costs.

The following statutory and regulatory mandates require the collection of acreage and production information from producers who wish to participate in certain USDA programs.

Section 508(f)(3) of the Federal Crop Insurance Act (7 U.S.C. §1515) requires producers to provide (1) annual records regarding crop acreage, acreage yields, and production for each agricultural commodity insured; and (2) report acreage planted and prevented from being planted by the designated acreage reporting date for the crop and location as established by the Federal Crop Insurance Corporation (FCIC). The Risk Management Agency administers these requirements for FCIC. (Please note that this is not an FSA requirement.)

7 U.S.C. 7333 (b)(3) specifically requires, for crops and commodities covered by the Noninsured Crop Disaster Assistance Program (NAP), annual reports of acreage planted and prevented from being planted must be reported, as required by the Secretary, by the designated acreage reporting date for the crop and location as established by the Secretary.

The Common Crop Insurance Policy Basic Provisions at 7 CFR 457.8 provide that insured producers must submit an annual acreage for each insured crop in the county on or before the acreage reporting date contained in the Special Provisions, or other date as specified.

7 CFR 1437.7(d) requires that reports of acreage planted or intended but prevented from being planted must be provided to Commodity Credit Corporation (CCC) at the administrative Farm Service Agency (FSA) office for the acreage no later than the date specified by CCC for each crop and location.

Sections 1614 and 11020 of the Agricultural Act of 2014 specify the Secretary shall reduce administrative burdens and cost to producers by streamlining and reducing paperwork, forms and other administrative requirements, including through implementation of the Acreage Crop Reporting Streamlining Initiative.

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.**

To ensure statutory criteria are met for Federal crop insurance, FSA, and Commodity Credit Corporation programs, the collection of commodity, acreage, and production information is necessary. This is not a request for a change, addition or deletion to the currently approved information collection. The information collected will be the same information currently collected and will be used in the same manner it is currently used.

Producers have been reporting required information to both their FSA County Office and crop insurance agent. The ACRSI initiative identified the subset of information required

to be reported to both RMA and FSA, established department standards for the collection of that information, and developed systems to allow that common information to flow from the point where it is first reported to the department to others who require the same information (e.g. from the FSA County Office to the AIP for use by the producers insurance agent). System and process enhancements are inherent to the ACRSI lifecycle with work underway to improve how producers' precision-ag systems and farm management information systems share information with USDA and how USDA uses that information.

FSA and RMA continues to implement the ACRSI initiative in phases. The effectiveness and lessons learned from each phase informed changes and expansions in subsequent phases. The first phase was initiated in the fall of 2011 in Dickenson, Marion, McPherson and Saline Counties in Kansas, and only for the collection of information from producers regarding winter wheat. The second phase was implemented in the spring of 2015 in 30 counties of Illinois and Iowa covering 9 crops. The third phase was implemented in the fall of 2015 in all counties of 15 states covering 9 crops. The fourth phase was implemented in the spring of 2016 in all counties nationwide covering 13 crops and about 90 percent of reported acreage. The fifth phase was implemented in the fall of 2016 expanding nationwide coverage to 16 crops and about 93 percent of reported acreage. The sixth phase was implemented in the fall of 2017 expanding nationwide coverage to 25 crops and about 94 percent of reported acreage.

It is envisioned that incremental adjustments and expansion will continue until all commodities that are practical to include are included. It is also envisioned that additional functionality will be added to allow for the submission and sharing of more of the information collected by both agencies, thereby further reducing the reporting burden.

Given the many differences between the two programs, producers must still complete, review, and sign both an FSA acreage report (form FSA-578) and an RMA acreage report. But the ACRSI backbone allows for the majority of the required common information to be reported once and shared with the other Agency, where it can be prepopulated and available for review by the producer when they arrive. This process improvement assures the same subset of common producer and acreage data is reported to all department agencies and reduces the amount of time required of the producer to satisfy department reporting requirements. Once collected, information may also be shared with the Natural Resources Conservation Service and the National Agricultural Statistics Service, if needed.

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.**

Producers are required to annually report certain information to both their FSA County Office and crop insurance agent. Over time, farm management information systems have evolved to provide producers practical options to automate the collection, organization, and preparation of information about their farming operations. Increasingly, producers

use these systems to generate tabular reports and electronic files to satisfy a range of business needs including department reporting requirements.

Under ACRSI, the department has established data standards for common producer and acreage information reported to FSA and RMA. These data standards provide the foundation for leveraging technology to collect and share this information. And, as ACRSI functionality is further expanded and adopted, producers will be increasingly able to leverage their technology investments to report increasing amounts of information electronically to either one of these channels or a third party, and have that information shared. (for example, CIMS)

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.**

FSA and RMA share many common customers. Currently, many of those customers are required to report some of the same commodity and acreage information for use by both agencies.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

There are no additional reporting requirements created specifically for small businesses to meet the requirements

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.**

We would not be able to administer their respective programs in accordance with the applicable statutory/regulatory mandates without collection of the applicable information. In addition, failure to collect the applicable information could result in unearned Federal benefits being issued or producers being denied eligibility to program benefits.

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 three 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 statute 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. The agency is able to certify compliance with 5 CFR 1320.

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 60-day notice was published on June 18, 2018, at 83 FR 28182-28183. No comments were received.

Listed below are the System of Records that were amended and published in the federal register on December 11, 2007, Volume 72 Number 237, page 70290-70293. USDA/FCIC-2, Compliance Review Cases; USDA/FCIC-8, List of Ineligible Producers; USDA/FCIC-9, Agent; USDA/FCIC-10, Policyholder; and USDA/FCIC-11, Loss Adjuster.

Dennis Daggett, Senior VP, Strategic Initiatives, ProAg, (800) 852-4497  
 Jessica Trites-Rolle, Rural Community Insurance Services, 763.433.2377  
 Cameron Silveus, Silveus Insurance Group, 800.531.9909

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

There are no payments or gifts provided to respondents.

10. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Information collected is handled according to established FSA and RMA procedures implementing the Privacy Act, Freedom of Information Act, and OMB Circular A-130, "Responsibilities for Maintenance of Records About Individuals by Federal Agencies."

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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.**

No data is collected that may be considered sensitive or personal in nature.

12. **Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

Based on RMA policyholder data, 501,012 policyholders filed acreage reports for the 2017 CY. Since we know that virtually all RMA policyholders also report to FSA, RMA estimates that these 501,012 policyholders proceeded to complete and verify their acreage reports with the FSA County office or a Crop Insurance Agent, to be known as the other channel. The estimated average time spent at the other channel is 15 minutes. We also know that roughly half of these policyholders file both a spring and a fall acreage report thus we use a factor of 1.5 for the estimated number of responses per respondent. As indicated in the burden grid, this activity results in an estimated total burden of 187,880 hours for the 2017 CY.

FSA and RMA estimates that upon full implementation of ACRSI almost all of the 501,012 total estimated respondents use the Clearinghouse to report their information or download their information directly using their precision ag or farm management information systems.

Upon full implementation of ACRSI, it is expected that almost all annual respondents will use the Clearinghouse or use their precision-ag systems and farm management information systems to upload the information to USDA.

The estimated annualized cost to respondents for providing the information is \$6,288,343.6087 (187,880 hours x \$33.47). The median hourly wage for farmers, ranchers and other agricultural managers is \$33.47 according to the U.S. Department of Labor, Bureau of Labor Statistics May 2017 Occupational Employment Wages 11-9013 report for farmers, ranchers and other agricultural managers.

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 is no start-up/capital or operation/maintenance costs associated with this program.

14. **Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

RMA and FSA does not produce or distribute forms; therefore, there is no cost of producing or distributing forms for RMA. There is also no cost to RMA for the collection of the information from the producer because it is collected by the AIPs through their representatives and agents and covered by the existing Standard Reinsurance Agreement. However, the form of FSA-578 is available in an electronic form to complete by producers at the County office for Noninsured Crop Disaster Assistance Program (NAP)

The recurring maintenance costs for ACRSI technology components is estimated to be minimal, less than \$10,000 per year. However, future development costs would be incurred depending on technology enhancements for the intake, distribution, and display of producer data. Based on similar past projects, upgrading the intake and distribution of precision ag data to a scaled solution would cost between \$500,000 and \$1,000,000. Upgrading the display of that precision ag data for FSA would cost an estimated \$567,600.

15. **Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

The indicated 501,012 total estimated respondents reflect actual CIMS data for the 2017 crop year. There is an increase of respondents by 208,012, due to the continued expansion of ACRSI to more crops and nationwide use.

The travel time was removed from the burden hours for the respondents going to the county offices to do regular and customary business with RMA and FSA for any FSA or CCC programs; this means no travel time is required specifically for the information collection and therefore, it is no longer included in the burden hour reporting; this reduced the burden hours by 29,300 hours. The total burden hour reduction of 171,045 hours also reflects the change to only include the additional times for customers (15 minutes) which was 60 minutes 3 years ago. After reevaluating the burden it was determined that customers only needed 15 minutes to provide RMA specific information after having provided the shared information to FSA county offices.

16. **For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

Neither FSA nor RMA currently intends to publish the information collection. NASS may make available data obtained through ACRSI in its annual reports.

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 being sought to not display OMB approval.

18. **Explain each exception to the certification statement identified in Item 19 of the 83-I.**

This information collection meets the certification requirements of SF-83-I, Item 19.