

**SUPPORTING STATEMENT**  
**Generic Testing – Local Foods**  
**OMB No. 0535-0248**

This mini-supporting statement is being submitted to OMB to define the need for conducting qualitative research, in the form of cognitive interviews, in an effort to reduce measurement error in the next iteration of the Local Foods Marketing Practices Survey. No more than 20 operations will be interviewed in this research effort. The next iteration of the survey will most likely be in January 2021 – April 2021, referencing the 2020 calendar year.

The 2015 Local Food Marketing Practices Survey was conducted as a new information collection in 2016 to gather data related to the production and marketing of food from the producers to consumers. The questionnaire collected information on market channels, value of sales, marketing expenses, practices, third party certification and food safety, and personal characteristics. Responses to that survey were voluntary.

Data analysis of the 2015 data suggests some respondents had difficulty comprehending some questions on the survey and forming responses that satisfied the data requests. As such, survey methodologists at NASS would like to use cognitive interviews to refine the existing questionnaire prior to the next survey iteration. Specifically, NASS survey methodologists would like to answer the following research questions:

- What do respondents, who sell locally, produce and where do they sell it?
- When respondents think of local marketing, what marketing channels come to mind?
  - o What local marketing channels do they use?
- How are their records kept to document what is sold where?
- How do respondents think of the local foods marketing practices concepts identified in the survey?
- When they talk about marketing their products locally, what terminology do they use?
  - o Is it the same as NASS terminology or something different?
- What questions are difficult or impossible for respondents to answer? Why are they unable to answer these questions?

**A. JUSTIFICATION**

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

Prior to the launch of the 2015 Local Food Marketing Practices Survey, nine cognitive interviews were conducted to assess the efficacy of the new information collection. Several changes were made to the questionnaire based on these interviews. However, many issues arose during data collection. For example, analysis of the follow-on Local Foods Marketing Practices Misclassification Survey (its primary purpose to produce a misclassification weight) showed that many respondents seemed to be unfamiliar with the term “intermediate markets.” Findings from analysis of the misclassification data also illustrated that a large number of operations changed their status (in-scope to out-of-scope and vice-versa) during the question that probed on the intermediate markets construct. These examples, along with other problems identified with the concepts, questions, and question ordering on the questionnaire during previous cognitive testing, submission of post survey suggestions from NASS staff, and data analysis, illustrates the need for further research to reduce potential measurement error related to the questions and concepts in this survey and supplemental materials.

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

The information gathered through the qualitative research will be analyzed by NASS’s Methodology Division, Statistics Division, and Census and Survey Division to determine the content, as well as the best way to ask questions about the constructs of interest on the next Local Foods Survey.

The types of questions used for the qualitative research are shown in Attachment A.

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

The qualitative research proposed will be done on the phone or in person by NASS or NASDA staff.

**4. Efforts to identify duplication.**

Operators who are selected for the qualitative research interviews will be drawn from NASS list of known farm operations who fit, or are likely to fit, the screening criteria for the survey. Duplication is removed before operators are added to the NASS list frame. No additional efforts will be taken to identify duplication.

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

For the qualitative research interviews, no special efforts will be made to minimize burden of small businesses. We hope to include operations of all sizes in the qualitative interviews.

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

The qualitative research is planned to be conducted during a one year period between November 2019 and November 2020, as resources become available.

**7. Special circumstances.**

There are no special circumstances associated with this information collection.

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

Not applicable.

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

There are no payments or gifts to respondents.

**10. Confidentiality provided to respondents.**

The same confidentiality that is applied to the Local Foods Survey will be applied to data collected during the qualitative research interviews.

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

The Local Foods Survey questions related to farm related income, some operating expenses, and demographics could be considered sensitive. These are similar questions to those that have been used on the 2015 Local Foods Survey, the 2017 Census of Agriculture, and other surveys in the past.

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

All interviews will be conducted by trained cognitive interviewers in NASS regional and state field offices, and survey methodologists at NASS headquarters to explore how respondents understand the underlining constructs within the questionnaire, and make sure that the respondents understand the intent of each question and are able to provide the requested

information. The estimated average time to complete a survey in a live situation is approximately 30 minutes. For the cognitive testing the average time is estimated at 90 minutes per respondent.

We plan to conduct a maximum of 20 one and a half hour cognitive interviews for a total of 30 total burden hours. Reporting time of 30 hours is multiplied by \$36.84 per hour for a total cost to the public of \$1,105.20.

NASS uses the Bureau of Labor Statistics' Occupational Employment Statistics (most recently published on March 29, 2019 for the previous May) to estimate an hourly wage for the burden cost. The May 2018 mean wage for bookkeepers was \$20.25. The mean wage for farm managers was \$38.43. The mean wage for farm supervisors was \$24.42. The mean wage of the three is \$27.70. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.84 per hour.

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

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

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

Costs for conducting the qualitative research interviews are estimated at \$20,000. This will cover expenses for staff payroll, travel, survey analysis, and any other expenses that may be incurred while updating survey materials based on our findings.

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

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

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

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

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

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

**18. Exceptions to certification statement.**

There are no exceptions to the certification statement.

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

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

NASS will use expert knowledge, list frame data, and survey data to identify operations or operators that meet the screening criteria for the Local Foods Survey. The operators will not be statistically sampled; rather, they will be hand selected based on whether they market foods locally, as well as their characteristics, such as demographics, size, number and types of commodities produced, marketing channels they reported using, and geographic location. HQ staff, NASS State Office Staff, Regional Field Office staff, stakeholders, and NASDA interviewers may recruit respondents for the interviews.

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

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

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

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

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

Not applicable.

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

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

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