

1 Supporting Statement – Part A

AGRICULTURAL THEFT SURVEY

OMB No. 0535-0264

This supporting statement addresses the new data collection effort for the Hawaii Agricultural Theft Survey for commodity year 2019. This project will collect data from a sample of farmers and ranchers with land operated in the State of Hawaii. The reference period will be commodity year 2019. The survey is planned for only commodity year 2019.

Data collected under this supporting statement are for a cooperative agreement between the National Agricultural Statistics Service (NASS) and Hawaii Department of Agriculture. The purpose of this survey is to measure the theft of crops, livestock, chemicals and fertilizer, machinery and equipment, and other property by county that meets NASS disclosure standards. It will also measure vandalism by the same type of thefts listed previously. Agricultural theft is a problem of interest in Hawaii. The collected data will be used by the State Department of Agriculture to ascertain the extent of loss from theft or vandalism in calendar year 2019.

A. JUSTIFICATION

This survey is being conducted through a cooperative agreement with Hawaii Department of Agriculture under a full-cost recovery basis. NASS has cooperative agreements with State Departments of Agriculture and Land Grant Universities to fulfill its mission of providing timely, accurate, and useful statistics in service to United States agriculture. These cooperators often seek NASS's assistance to provide statistics beneficial to agriculture, but are not covered by NASS's annual Congressional appropriation. General authority for conducting cooperative projects is granted under U.S. Code Title 7, Section 450a which states that USDA officials may, "enter into agreements with and receive funds...for the purpose of conducting cooperative research projects..."

NASS benefits from these cooperative agreements by: (1) obtaining additional data to update its list of farm operators; (2) encouraging both parties to coordinate Federal survey activities and activities funded under a cooperative agreement to reduce the need for overlapping data collection and/or spread out respondent burden; and (3) facilitating additional promotion of NASS surveys and statistical reports funded by annual Congressional appropriations.

Respondents benefit from these cooperative agreements by: (1) having their reported data protected by Federal Law (U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Public Law 107-347, Title V (CIPSEA)); (2) having data collection activities for Federal and Cooperative surveys coordinated to

minimize respondent burden; and (3) having high-quality agricultural data that are important to a state or region be collected and published.

- 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 current official State and national estimates of crop and livestock production, value, disposition, and resource use.

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 collection 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.**

NASS will conduct a survey of agricultural operations in Hawaii. According to the NASS report "Farms and Land in Farms, 2017 Summary", there are an estimated 7,000 farms in Hawaii. Each selected farmer or rancher will be asked to provide data on

- Number and value of theft, vandalism, and trespassing incidents in 2019,
- How many incidents were reported and acted on, and
- How much was spent to reduce future incidents along with effectiveness.

The information that will be summarized and published will include totals for incidents, number reported, amount spent, and effectiveness. It is hoped that enough data will be collected to allow publishing of this data by county.

- 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.**

During this data collection, NASS will mail out a paper questionnaire along with a cover letter and return envelope. There will be instructions to respond via Computer Aided Web Interviewing (CAWI). Operators who do not respond to this mailing or by CAWI will be contacted by a Computer Assisted Telephone Interview

(CATI) or by Computer Assisted Personal Interview (CAPI). Data will be collected by a trained National Association of State Departments of Agriculture (NASDA) enumerator.

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.

NASS cooperates with State departments of agriculture, land grant universities, and other State and Federal agencies to conduct surveys. Wherever possible, surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry.

There have been informal surveys conducted in the past to obtain the information on theft in previous years. None have tried to use sampling and non-response weights to estimate damage at the county level.

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

This information collection will not have a significant economic impact on small entities. Out of the estimated sample size of 1,500, approximately 85% or 1,275 are estimated to be classified as small operations.

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.

One planned use of the data is to present the summarized results to be available to Hawaii legislature, the Hawaii Department of Agriculture, and College of Tropical Agriculture and Human Resources of the University of Hawaii (CTAHR) for them to consider for farmers and ranchers across the State. Interest in this topic has been expressed by producers along with a possible program to reduce agricultural theft/vandalism/trespassing. Hawaii farmers and ranchers will benefit from this survey by having statistically defensible estimates of theft/vandalism/trespassing from 2019 at the local level.

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 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.**

Not applicable.

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.

The Hawaii Department of Agriculture requested and received input on these technologies from stakeholders. Input was received from the cooperator, Hawaii Department of Agriculture, Hawaii County Directors, Senator Mike Gabbard (Oahu, Senate District 20), and NASS survey methodologists.

- 9. Explain any decision to provide any payment or gift to respondents.**

No payment or gifts will be provided 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>.

All individuals who may access these confidential data for research are also covered under Titles 18 and CIPSEA and must complete a Certification and Restrictions on Use of Unpublished Data (ADM-043) agreement.

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 hours based on the average completion time per questionnaire are summarized below.

Burden hour calculations are shown below. The minutes-per-response figures were estimated based on consultation with NASS survey methodologist. 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 420 hours is multiplied by \$36.84 per hour for a total cost to the public of \$ 15,472.80.

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.

0535-0264 - Projected Respondent Burden for 2019

Commodity	Sector	State	Sample Size	Waves of Data Collection	Resp. Count	Waves X Count	Min. / Resp	Burden Hours	Non-Resp Count	Waves X Count	Min / Non Resp.	Burden Hours	Total Burden Hours	
Crop and Livestock	Growers and Ranchers	First Mailing												
		Hawaii	1,500	1	525	525	15	131	975	975	2	33	164	
		Subtotal	1,500		525	525		131	975	975		33	164	
		Phone Follow-Up	975	1	675	675	15	169	300	300	2	10	179	
Publicity Materials														
		Cover Letter and/or EDR Instruction Sheet	1,500		525	525	5	44	975	975	2	33	77	
TOTALS			1,500		1,200	1,200		344	300	1,275		76	420	

13. Provide an estimate of the total annual cost burden to respondents or record-keepers 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 projected annual cost to conduct the Agricultural Theft Survey is approximately \$70,800, most of which is staff costs. The costs will be reimbursed by the Hawaii Department of Agriculture. There will be no cost to the Federal government.

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).

This is a new request, so there is no current inventory.

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 Regional Field Office (RFO) is responsible for manually editing and processing the questionnaires. The RFO creates and provides editing guidelines and estimation documentation to help ensure that all questionnaires are edited and analyzed in a consistent manner. After the data has been key entered and run through computer edits, detailed computer analyses and summaries of the data are provided by the RFO for evaluation and estimation.

In April 2020, estimates of Agricultural theft/vandalism/trespassing will be published in an Agricultural Theft report.

2019 Survey:

Survey design.....	February, 2019 - July, 2019
Sample selection.....	May, 2019
Questionnaire design.....	February, 2019 - June, 2019
Mail Survey.....	January, 2020
Phone Follow-up.....	February, 2020
End of Data Collection.....	February 28, 2020
Publication.....	April, 2020

- 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 requested for 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, 2019