

## 1 Supporting Statement – Part A

### **POULTRY LITTER NUTRIENT DISTRIBUTION PRODUCER SURVEY**

OMB No. 0535-0264

This supporting statement addresses the new data collection effort for the Poultry Litter Nutrient Distribution Producer Survey for commodity year 2019. This project will collect data from a sample of farmers and ranchers in Delaware, Maryland, Pennsylvania, and Virginia with

- 200 or more acres of row crops (corn, soybeans, wheat, peanuts, cotton),
- 25 or more acres of specialty crops (vegetables, fruit, flowers), and/or
- at least \$10,000 of floriculture sales

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), Maryland Department of Agriculture (MDA), and University of Delaware (UD). The goal of this project is to identify opportunities to expand poultry litter nutrient distribution from areas of concentrated animal production to reduce phosphorus loss to surface waters and generate new sources of revenue for poultry growers. A key component of this effort is to solicit feedback from farmers that are currently not utilizing poultry litter or poultry litter co-products to identify barriers to adoption and potential new markets for these materials.

#### **A. JUSTIFICATION**

This survey is being conducted through a cooperative agreement with Maryland Department of Agriculture and University of Delaware 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 Delaware, Maryland, Pennsylvania, and Virginia. According to the NASS report "Farms and Land in Farms, 2017 Summary", there are an estimated 110,200 farms in the four State region (DE, MD, PA, and VA). Each selected farmer or rancher will be asked to provide data on

- Basic crop and tillage practices in 2019,
- Preferred sources of nutrients and actual sources of nutrients used,
- Where the operator gets information and recommendations on nutrients, and
- Farmer perception between poultry litter co-products and other sources of nutrients.

The information that will be summarized and published will include totals and percentages for these items. It is hoped that enough data will be collected to allow publishing of this data at the sub-state level, if NASS disclosure standards are met.

- 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 a reminder postcard followed by a second mailing of questionnaire and cover letter. Operators who do not respond to these mailings 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.

**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 1000, approximately 80% or 800 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.**

A comprehensive evaluation of farmer preferences for using fresh poultry litter or poultry litter ash co-products has not been previously conducted in the Chesapeake Bay area.

Data may be used for market development, policy, and/or budgeting for cost-share/poultry transport programs. Stakeholders would be farmers (poultry growers and crop producers), policy makers, technology vendors, fertilizer manufacturers, and manure brokers/haulers.

Information from the survey could be used by commercial fertilizer dealers, poultry growers, technology vendors, or state agencies to make investment decisions regarding fresh poultry litter and poultry litter ash co-products. For example, policy makers could base changes to the state cost share program for manure transport

on the results, or a fertilizer company/technology vendor could invest in a new fertilizer product based on the results.

The survey will also complement on-going efforts in Chesapeake Bay states to achieve water quality goals via promoting on-farm and regional phosphorus balance. Several states (Maryland and Delaware for example) offer funding to transport poultry litter from farms where it is produced to fields where it is needed. Despite cost share incentives to use poultry litter, many farmers choose not to use poultry litter. This survey will identify barriers to expanded use of poultry litter on farms in the region.

**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 project team providing input on the questionnaire and survey goals are:

- Dr. Leah Palm-Forester (University of Delaware, Assistant Professor with the Department of Applied Economics and Statistics);
- Dr. Amy Shober (University of Delaware, Associate Professor and Extension Specialist, Nutrient Management with the Department of Plant and Soil Sciences);
- Dr. Mark Reiter (Virginia Polytechnic Institute and State University, Associate Professor of Soils and Nutrient Management with the Eastern Shore Agricultural Research and Extension Center);
- Dr. Kimberly Morgan (Virginia Polytechnic Institute and State University, Assistant Professor and Kohl Junior Faculty Fellow with the Department of Agricultural and Applied Economics);
- John Ignosh (Virginia Polytechnic Institute and State University Biological Systems Engineering/Extension Area Specialist, Agricultural Byproduct Utilization);

- Dr. Gurpal Tor (University of Maryland, Associate Professor and Extension Specialist, Nutrient Management and Water Quality with the Department of Environmental Science and Technology);
- Hans Schmidt (Assistant Secretary, Resource Conservation, Maryland Department of Agriculture);
- Louise Lawrence (Chief, retired, Resource Conservation, Maryland Department of Agriculture);
- Alisha Mulkey (Program Manager, Program Planning and Development Maryland Department Agriculture);
- Kristen Hughes Evans (Executive Director, Sustainable Chesapeake)

**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 493 hours is multiplied by \$36.84 per hour for a total cost to the public of \$ 18,162.12.

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 2020

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	
Field Crop and Specialty Crop	Growers and Ranchers	<b>First Mailing</b>												
		Delaware	55	1	8	8	25	3	47	47	2	2	5	
		Maryland	311	1	47	47	25	20	264	264	2	9	29	
		Pennsylvania	191	1	29	29	25	12	162	162	2	5	17	
		Virginia	443	1	66	66	25	28	377	377	2	13	41	
		<b>Subtotal</b>	1,000		150	150		63	850	850		29	92	
		<b>Reminder Postcard</b>	850	1	43	43	25	18	807	807	2	27	45	
		<b>Second Mailing</b>	807	1	81	81	25	34	726	726	2	24	58	
	<b>Phone Follow-Up</b>	726	1	526	526	25	219	200	200	2	7	226		
<b>Publicity Materials</b>														
		Cover Letter and/or EDR Instruction Sheet	1,807		231	231	5	19	1,576	1,576	2	53	72	
<b>TOTALS</b>			1,000		800	1,031		353	200	4,159		140	493	

**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 Poultry Litter Nutrient Distribution Producer Survey is approximately \$74,400, most of which is staff costs. The costs will be reimbursed by the Maryland Department of Agriculture and University of Delaware. 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.

By July 2021, findings from this survey and focus groups will be published in a report published by the cooperators, Maryland Department of Agriculture and University of Delaware.

Survey Timeline:

Survey design.....February - December, 2019  
Sample selection.....January, 2020  
Questionnaire design.....September - December, 2019  
Mail Survey.....March, 2020  
Postcard Reminder.....April, 2020  
Second Mailing.....May, 2020



Phone Follow-up.....May, 2020  
End of Data Collection.....June, 2020  
Dataset delivery to Cooperators...July, 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.

January, 2020