

**2019 SUPPORTING STATEMENT-Part A
Local Food Directories and Survey
OMB NO. 0581-0169**

Terms of Clearance: OMB appreciates that AMS is committed to providing quality, useful information to the public through the National Farmers Market Directory, and to conducting relevant and timely research on farmers' markets through the associated survey collections. AMS agrees to sponsor a working group composed of stakeholders across the Department of Agriculture, focused on identifying efficiencies and developing the sampling methods and procedures necessary to allow these survey collections to be generalized across the population of US farmers' markets. Until this work can be completed and approved by OMB through a revision to the clearance package, AMS agrees to not present results from these collections as Nationally representative, and to include a statement of limitations on all official publications resulting from these collections based on the limitations section in Supporting Statement Part B.

In compliance with OMB terms of clearance, USDA's Agricultural Marketing Service convened a USDA working group comprised of stakeholders across the Department of Agriculture to determine the data needs of the Department as it relates to the farmers market sector. The working group initiated the development of a Memorandum of Understanding between AMS and National Agricultural Statistical Service, (NASS) to implement a representative survey of the U.S. farmers market sector that fulfills the data needs of the Department and allow for statistically sound generalizations of findings across the population of U.S. farmers sector. AMS has worked closely with NASS staff in questionnaire development to ensure that the survey questionnaire is aligned with desired research goals of the Department and the farmers market sector.

A. Justification.

- 1. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION.**

The primary legislative basis for conducting farmers market research is the Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627). This act broadened the scope of USDA activities to include the entire spectrum of agricultural marketing, including direct marketing. Sec. 203a of the Act states that the Secretary of Agriculture is directed and authorized, "to determine the needs and develop or assist in the development of plans for efficient facilities and methods of operating such facilities for the proper assembly, processing, storage, transportation, distribution, and handling of agricultural products..." In addition, the Farmer-to-Consumer Direct Marketing Act of 1976 supports USDA's work to enhance the effectiveness of direct marketing.

In line with this legislative mandate, the Marketing Services Division (MSD) of USDA's Agricultural Marketing Service identifies marketing opportunities and provides analysis to improve farmers markets and other direct-to-consumer marketing activities.

Information from this collection is used to populate USDA's Local Food Directories which consist of four national directories, USDA's: Farmers Market Directory, Community Supported Agriculture, (CSA) Directory, Food Hub Directory and On-Farm Market Directory. These directories provide no-cost advertising for these four direct to customer marketing channels. Greater visibility of these marketing channels increases customer awareness of these enterprises, enhance market transparency and thereby promote sales through these marketing channels. The use of these marketing channels has enabled farmers to receive a larger share of customers' food dollar.

USDA's Farmers Market Directory, the most robust and complete database of farmers markets in the United States, contains listings for over 8,700 farmers markets in the country. USDA's Community Supported Agriculture Directory lists over 800 CSA enterprises. USDA's Food Hub Directory lists over 200 food hubs and USDA's On-Farm Market Directory lists over 1,400 on-farm markets. Beyond those data users who are directly involved in these marketing channels, the data collected by AMS are widely used by community planners, public health officials and Geographic Information System, (GIS), research specialists to guide decisions pertaining to community quality of life and investment decisions, by software developers looking to develop popular mobile applications, and by general members of the public seeking local sources of high-quality fresh food.

Topic areas in USDA's National Farmers Market Managers Survey include characteristics of farmers markets, market locations, types of products sold, months days and time of operation, number of vendors, and vendor characteristics, availability of nutrition assistance and education programs, special events, vendor retention, market growth and enhancement, what information farmers market managers have and how they derive estimates of the number of customers, customer preferences, and sales.

As mandated by our legislative authority, our data collection and analysis of farmers markets allow us to provide support and technical guidance to the small to medium-sized agricultural producers who rely on farmers markets to market their products in combination with other direct to consumer marketing arrangements.

Direct marketing through the nation's farmers markets provides an opportunity to increase the utilization of successful USDA programs, such as the Women, Infants, and Children (WIC) program, WIC Farmers Market Nutrition Program, WIC Cash Value Voucher, Senior Farmers Market Nutrition Program and the Supplemental Nutrition Assistance Program (SNAP) (formally called "food stamps"). They also provide a "teachable moment" for diet, health, and nutrition services and programs. Efforts to enhance direct marketing opportunities supplement a continuing cross-Departmental program that endeavors to enhance fresh food access, stimulate local economic

development, improve community, quality of life, and combat obesity by making fresh fruits and vegetables more accessible.

The definitions of farmers markets, on-farm market, CSA, and food hub are listed below.

A *farmers market* is a collection of two or more farm vendors selling agricultural products directly to customers at a common, recurrent physical location.

An *on-farm market* is an area of a facility affiliated with a farm where transactions between a farm market operator and customers take place. An on-farm market may operate seasonally or year-round. On-farm markets are an important component of direct marketing, adding value by offering customers a visit to the farm and the opportunity to purchase products from the people who grew them. Producers selling from the farm reduce their transportation cost and time away from their operation required to market their products directly to customers.

CSA is another type of food-production and direct marketing relationship between a farmer or network of farmers and consumers who typically purchase “shares” of the season’s harvest in advance of the growing season. The upfront working capital generated by selling shares in advance of harvest reduces the financial risk to the farmer and improves their cash flow. In addition, farmers generally receive better prices for goods marketed through their CSA crops than through wholesale marketing channels. Meanwhile, consumers benefit by receiving regular (usually weekly) deliveries of fresh locally-grown vegetables, fruit, meats, eggs and/or other food items. They also benefit from the ability to directly support the economic viability of local farmers through their purchasing decisions.

Food hub is a business or organization that actively manages the aggregation, distribution, and marketing of source-identified food products, primarily from local and regional producers, to enhance the ability of small and medium-sized to access wholesale, retail, and institutional marketing channels by allowing them to meet buyer requirements and specifications through collective marketing arrangements, and thereby increase the volume of sales they are able to generate. In many cases, the use of food hubs allows small and medium-sized farm operators to obtain higher prices for their agricultural products than they would in alternative wholesale outlets because of the ability to differentiate their products based on origin and other desired quality characteristics.

In combination with farmers markets, on-farm markets, CSAs and food hubs allow consumers to have greater access to a broader range of locally grown, farm fresh produce, often give farmers the opportunity to develop a personal relationship with their customers and cultivate consumer loyalty. By providing consumers greater access to fresh fruits and vegetables, they have been influential in encouraging consumers to purchase a greater volume of fresh produce, a behavior associated with better dietary habits and health outcomes.

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.

This collection gathers the information necessary to populate the four direct to customer directories contained in USDA's Local Food Directories. USDA's: National Farmers Market, National CSA, National Food Hub and National On-Farm Market Directories. These directories provide free advertising to the operators of these four direct to customer marketing channels. Approximately 5,000 directory updates occur annually. In addition, this collection enables a comprehensive survey of farmers market sector with USDA's National Farmers Market Managers Survey.

USDA's Local Foods Directories

National Farmers Market Directory currently has over 8,700 hundred markets listed. AMS gets regular requests from University researchers for annual archives of the Directory to analyze changes in the sector over time. Listing information include but is not limited to the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. USDA's National Farmers Market Directory has been identified as one of the Departments first-move candidates to meet OMB's call for web application programming interfaces and mobile optimized services to go on line. Below is a link to this directory:

<https://www.ams.usda.gov/local-food-directories/farmersmarkets>

National Community Supported Agriculture (CSA) Directory:

The National CSA Directory currently contains over 800 listings. Listing information include but is not limited to the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. The information displayed in the listing is designed to inform and attract potential customers of this direct to customer agricultural enterprise.

<https://www.ams.usda.gov/local-food-directories/csas>

National Food Hub Directory:

The National Food Hub Directory currently contains over 200 listings. Listing information include but is not limited to the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. The information displayed in the listing is designed to inform and attract potential customers of this direct to customer agricultural enterprise.

<https://www.ams.usda.gov/local-food-directories/foodhubs>

National On-Farm Market Directory:

The National On-Farm Market Directory contains over 1,400 listings. Listing information include but is not limited to the business name, address, contact information, operating months, days and times, products offered for sale, forms of payments accepted and the last time the listing was updated. The information displayed in the listing is designed to inform and attract potential customers of this direct to customer agricultural enterprise.

<https://www.ams.usda.gov/local-food-directories/onfarm>

All directories mentioned above are on-line directories and the public can export each directory into an Excel spread sheet.

The National Farmers Market Managers Survey data and subsequent reports developed from the survey have been utilized by various USDA agencies, State Departments of Agriculture, extension educators, industry stakeholders and trade associations, community planners, public health officials, farmer groups, and non-profit organizations to improve market operations and performance, and evaluate the impact of federal nutrition programs on farmers market sales. A copy of USDA’s National Farmers Market Managers Survey is attached. AMS and NASS plan to conduct this survey every five years.

- 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.**

The survey questionnaire will be mailed twice to farmers market managers. Each mailing of the questionnaire will include a cover letter and instructions of how the questionnaire can be completed online. Farmers market managers will have the option of responding via mail, on-line, phone enumeration, and/or field enumeration.

- 4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN ITEM 2 ABOVE.**

No other known information collection on the U.S. farmers market sector in the public domain has the breadth of our information collection, which will attempt to reach each

farmers market manager in the country. Consequently, we expect that data from this survey will be comprehensive enough to carry out national analysis.

5. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES (ITEM 5 OF THE OMB FORM 83-1), DESCRIBE THE METHODS USED TO MINIMIZE BURDEN.

The Small Business Administration defines, in 13 CFR Part 121, small agricultural producers as those having annual receipts of no more than \$750,000. We estimate that 100 percent of farmers markets are classified as small businesses.

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.

Previous research studies undertaken by Marketing Services Division (MSD) have been utilized by various USDA agencies, State Departments of Agriculture, extension educators, industry stakeholders and trade associations, community planners, public health officials, farmer groups, and non-profit organizations. Without this study both governmental and non-governmental organizations who contact our agency frequently for objective national and regional information on farmers markets would be deprived of a strategic marketing resource that facilitates effective planning, business development, resource allocation and policy formulation in the rapidly growing and evolving direct farm marketing sector. The compilation of a robust national database on farmers market activities allows for in-depth analysis of farmers market performance and operations by region and size of operation and provides essential guidance to market stakeholders at all stages of business development, as well as to policymakers who seek to support the expansion of farmers market activities.

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 3 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 STATUE 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. Data collection plans are consistent with 5 CFR 1320.6

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 agency published a notice in the Federal Register on 27th, March 2019, Vol. 84, No. 59, page 1482 and 1483, requesting an extension of and revision to a currently approved information collection. AMS received no comments from the public during the comment period. NASS reviewed Supporting Statement - Part B and provided a rewrite of the Statement. The NASS rewrites were used in totality.

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.

CONSULTATION WITH REPRESENTATIVES OF THOSE FROM WHOM INFORMATION IS TO BE OBTAINED OR THOSE WHO MUST COMPILE RECORDS SHOULD OCCUR AT LEAST ONCE EVERY 3 YEARS -- EVEN IF THE COLLECTION OF INFORMATION ACTIVITY IS THE SAME AS IN PRIOR PERIODS. THERE MAY BE CIRCUMSTANCES THAT MAY PRECLUDE CONSULTATION IN A SPECIFIC SITUATION. THESE CIRCUMSTANCES SHOULD BE EXPLAINED.

AMS has consulted with:

David Hancock - NASS OMB Clearance Officer

Ten Sheppard – NASS Census and Survey Division/Survey Admin. Branch

Clare Williams - NASS Survey Development Section/Data Collection Branch

Kenneth Pick - NASS Survey Statistician Survey Mythology Division

Rachel Sloan - NASS Standards and Survey Development Branch

Torey Lawrence – NASS Census and Survey Division

Pamela Coleman – NASS Census and Survey Division

Diane Eggert – New York Farmers Market Association

Jen Cheek – Farmers Market Coalition

NASS staff cognitively tested the questionnaire with farmers market managers

9. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES.

No payments or gifts are provided to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

This survey is conducted by NASS therefore 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 NASS protects information please visit: <https://www.nass.usda.gov/confidentiality>. Response to this survey is voluntary.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND 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 questions of a sensitive nature are asked of respondents.

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. UNLESS DIRECTED TO DO SO, AGENCIES SHOULD NOT CONDUCT SPECIAL SURVEYS TO OBTAIN INFORMATION ON WHICH TO BASE HOUR

BURDEN ESTIMATES. CONSULTATION WITH A SAMPLE (FEWER THAN 10) OF POTENTIAL RESPONDENTS IS DESIRABLE. IF THE HOUR BURDEN ON RESPONDENTS IS EXPECTED TO VARY WIDELY BECAUSE OF DIFFERENCE IN ACTIVITY, SIZE, OR COMPLEXITY, SHOW THE RANGE OF ESTIMATED HOUR BURDEN, AND EXPLAIN THE REASONS FOR THE VARIANCE. GENERALLY, ESTIMATES SHOULD NOT INCLUDE BURDEN HOURS FOR CUSTOMARY AND USUAL BUSINESS PRACTICES.

- 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.

Local Food Directories:

Local Food Directories is a collection of four surveys. The data collected by these surveys populate four direct to customer directories the Farmers Market, On-Farm Market, CSA, and Food Hub Directories. Each directory is national in scope. Below is the time burden/benefits/compensation cost for these directories.

National Direct to Customer Directory	Estimate of Population	Estimated Number of Enterprises that will list in Directory	Estimated Time to list Enterprise in Directory (hours)	Total Time Estimate (hours)	Hourly Wage Rate/ Benefit / Compensation (dollars)	Total Cost Estimate (dollars)
Farmers Market	15,000	3,500	0.133	465.50	\$29.72	13,834.66
On-Farm Market	50,000	1,000	0.133	133.00	\$29.72	3,952.76
CSA	6,500	400	0.133	53.20	\$29.72	1,581.10
Food Hub	250	125	0.133	16.63	\$29.72	494.24
Sub Total				668.33		\$19,862.76

* Cost includes benefits/compensation provided by guidance of Bureau of Labor Statistics Press Release dated December 14, 2018.

National Farmers Market Managers Survey:

It is estimated that it will take 28 minutes to complete the National Farmers Market Managers survey questionnaire.

Survey Name	Estimate of Population	Estimated Number of farmers markets that will be contacted	Estimated numbers of survey respondents	Estimated Time to list Enterprise in Directory (hours)	Total Time Estimate (hours)	Hourly Wage Rate (dollars)	Total Cost Estimate (dollars)
National Farmers Market Managers Survey Respondents	15,000	4,000	2,000	0.467	934.00	\$29.72	27,758.48
National Farmers Market Managers Survey Non-Respondents	Same population as above	2,000	1000	0.467	467.00	\$29.72	13,879.24
Sub Total	15,000	6,000	3,000		1,401		\$41,637.72
Local Food Directories and Survey Total					2,069.33		\$61,500.48

* Cost includes benefits/compensation provided by guidance of Bureau of Labor Statistics Press Release dated December 14, 2018.

This calculation was based on the median wage rate for occupation code 45-1011 (First-Line Supervisor/Managers of Farming, Fishing and Forestry Workers) reported by the Bureau of Labor Statistics, May 2018, (\$22.57 per hour) plus benefits of 31.7 percent. All questions asked in the questionnaire refer to data that market managers can be expected to have ready access to as part of their normal routine.

13. PROVIDE AN ESTIMATE 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 ESTIMATE 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. THE ESTIMATES SHOULD TAKE INTO ACCOUNT COSTS ASSOCIATED WITH GENERATING, MAINTAINING, AND DISCLOSING OR PROVIDING THE INFORMATION. INCLUDE DESCRIPTIONS OF METHODS USED TO ESTIMATE MAJOR COST FACTORS INCLUDING SYSTEM AND TECHNOLOGY ACQUISITION, EXPECTED USEFUL LIFE OF CAPITAL EQUIPMENT, THE DISCOUNT RATE(S), AND THE TIME PERIOD OVER WHICH COSTS WILL BE INCURRED. CAPITAL AND START-UP COSTS INCLUDE, AMONG OTHER ITEMS, PREPARATIONS FOR COLLECTING INFORMATION SUCH AS PURCHASING COMPUTERS AND SOFTWARE; MONITORING, SAMPLING, DRILLING AND TESTING EQUIPMENT; AND RECORD STORAGE FACILITIES.**

- **IF COST ESTIMATES ARE EXPECTED TO VARY WIDELY, AGENCIES SHOULD PRESENT RANGES OF COST BURDENS AND EXPLAIN THE REASONS FOR THE VARIANCE. THE COST OF PURCHASING OR CONTRACTING OUT INFORMATION COLLECTION SERVICES SHOULD BE A PART OF THIS COST BURDEN ESTIMATE. IN DEVELOPING COST BURDEN ESTIMATES, AGENCIES MAY CONSULT WITH A SAMPLE OF RESPONDENTS (FEWER THAN 10), UTILIZE THE 60-DAY PRE-OMB SUBMISSION PUBLIC COMMENT PROCESS AND USE EXISTING ECONOMIC OR REGULATORY IMPACT ANALYSIS ASSOCIATED**

WITH THE RULEMAKING CONTAINING THE INFORMATION COLLECTION, AS APPROPRIATE.

- **GENERALLY, ESTIMATES SHOULD NOT INCLUDE PURCHASES OF EQUIPMENT OR SERVICES, OR PORTIONS THEREOF, MADE: (1) PRIOR TO OCTOBER 1, 1995, (2) TO ACHIEVE REGULATORY COMPLIANCE WITH REQUIREMENTS NOT ASSOCIATED WITH THE INFORMATION COLLECTION, (3) FOR REASONS OTHER THAN TO PROVIDE INFORMATION OR KEEPING RECORDS FOR THE GOVERNMENT, OR (4) AS PART OF CUSTOMARY AND USUAL BUSINESS OR PRIVATE PRACTICES.**

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

- 14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COST, WHICH SHOULD INCLUDE QUANTIFICATION OF HOURS, OPERATION EXPENSES (SUCH AS EQUIPMENT, OVERHEAD, PRINTING, AND SUPPORT STAFF), AND ANY OTHER EXPENSE THAT WOULD NOT HAVE BEEN INCURRED WITHOUT THIS COLLECTION OF INFORMATION. AGENCIES ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.**

The projected cost estimate for the survey is \$621,266, a \$605,891 increase from the 2016 survey. This cost analysis includes the cost of benefits and compensation. Changes in the projected cost is primarily due to the interagency agreement between AMS and NASS. The survey work is statistically sound and maintains the precision necessary to make national inferences regarding the farmers market sector as outlined in the 2016 Terms of Clearance of OMB.

Cost of Cooperative Agreement and USDA Personnel	Cost Estimate
Maintain the IT platform for Local Food Directories	6,000
Interagency Agreement between AMS and NASS	605,000
Oversight of Cooperative agreement by MSD staff	
20 percent of the salary of GS 13, Step 7 for 3 months (\$116,365 x .25 x 0.20)	5,818
20 percent of the salary of GS 12, Step 3 for 3 months (\$88,959 x.25 x 0.20)	4,448

Cost of Cooperative Agreement and USDA Personnel	Cost Estimate
Total	\$621,266

15. EXPLAIN THE REASON FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-I.

NASS conducting of the 2020 National Farmers Market Managers survey is done to increase the statistical precision of the survey so that national inferences can be made regarding the U.S. farmers market sector as outlined by OMB in its Terms Clearance. The 2016 submission had in incorrect entry in ROCIS for the difference in burden. The OMB Notice of Action was correct in the number of burden hours, shown below, but was incorrectly entered in ROCIS. This entry shows a higher number than 450 due to the previous error.

<u>REG. NO.</u>	<u>REASON</u>	<u>PREVIOUS BURDEN</u>	<u>NEW BURDEN</u>	<u>DIFFERENCE</u>	<u>TYPE OF CHANGE</u>
	Inc. in Respondents	1,619	2,069	+450	A

PC = Program Change
A = Adjustment

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.

Survey dissemination, data analysis, and tabulations will be done by NASS

Dissemination of survey questionnaire	March/April of 2020
Data analysis complete	July 2020
Agricultural Statistics Board Bulletin	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.

The Department plans to print the expiration date of OMB approval of the information collection on all instruments. Expiration date 07/31/2022

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.