

1 Supporting Statement

2020-2021 CENSUS OF AGRICULTURE CONTENT TEST

OMB No. 0535-0243

A. JUSTIFICATION

This submission is for the reinstatement of the Census of Agriculture Content Test, which is conducted every five years prior to the full Census of Agriculture. The last content test was done in 2015 in preparation for the 2017 Census of Agriculture.

- 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 purpose of this data collection is to evaluate factors impacting the National Agricultural Statistics Service's Census of Agriculture program. Such factors include, but are not limited to, response burden, questionnaire format and design, Internet instrument performance, data collection strategies, and question wording. The proposed data collection instruments and other materials (contact card, cover letter, instruction sheet, postcard reminder, etc.) will be used in tests for the 2020-2021 production years in preparation for the 2022 Census of Agriculture. The full Census of Agriculture is required by law under the "Census of Agriculture Act of 1997," Pub. L. No. 105-113 (7 U.S.C. 2204g). It is the primary source of detailed State and county data that provide benchmark information for the agricultural sector. Testing is needed to measure respondents' abilities to comprehend the questions as worded, and provide the intended data and to test alternatives to data collection procedures used in previous censuses before conducting the full 2022 Census of Agriculture. Compared with the 2017 Census of Agriculture, most questionnaire changes are expected to be minor wording changes, limited content changes, improvements to the Internet instrument. In addition, this Content Test will include testing of data collection methodologies (to improve response rates and increase efficiency). Response to the 2020-2021 Census of Agriculture Content Test is voluntary.

- 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.**

The Census of Agriculture Content Test is conducted prior to the Census of Agriculture. It is designed to evaluate a number of factors affecting the Census

of Agriculture program, such as questionnaire format and design, Internet instrument design, new content items, changes to question wording, respondent burden, attitudes affecting response, processing and procedural changes, and data collection strategies. NASS will analyze the results of the test to identify modifications to incorporate into the final design of the 2022 Census of Agriculture data collection tools, data collection strategies, and processing methodologies. No public report will be issued from the data collected in the Census of Agriculture Content Test (except possible methodological reports presented at statistical or survey methodology conferences).

- 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.**

When practicable, NASS provides the option of Internet-based reporting for all information collections. The mail out Census of Agriculture Content Test will have a Computer Assisted Web Interview (CAWI) reporting version available. During some of the cognitive interviews and usability interviews, in addition to scripted probes regarding the content, respondents will be asked about their attitudes and ability to use the Internet to respond to the Census Content Test survey (in preparation for the 2022 Census of Agriculture). Respondents' comments will be evaluated as input for possible improvements NASS could make to the Internet instruments.

In addition, NASS wants to obtain respondent feedback on the use of Non-Edited Respondent Data (NERD). NERD data are data that the respondent has provided to NASS on previous surveys. The NERD data will only be available to respondents who access the CAWI instrument.

- 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.**

Data and evaluative information obtained from the Census of Agriculture Content Test are not available elsewhere.

- 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.**

Although the actual Census of Agriculture is required by law, all phases of this test collection are voluntary. Every effort will be made to minimize burden. This

Content Test will include testing of both paper forms and an Internet-based form. The flexibility of an Internet-based form will allow respondents who report on-line to skip sections of the form which do not apply to them. To the extent possible, operations targeted for regular NASS surveys will be excluded from the Content Test. Respondents will be permitted to use estimates if records are not available, or precise figures are unknown. A toll-free telephone help line will be available to aid in reporting.

The overall number of small operations that are classified as small operations by the Small Business Administration and will be contacted by these surveys is 33,800 or approximately 85% of the total.

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.

The Census of Agriculture is required by law every five years; the Census of Agriculture Content Test is conducted approximately two years before the full census. Eliminating this testing or doing it less frequently would permit reporting problems in new items and allow other identified existing problems to remain in future administrations of the Census of Agriculture. Many of the items on the Census of Agriculture do not appear on any other NASS surveys, so the Content Test is the single opportunity to test these items before they are used in the Census of Agriculture. The following examples illustrate the kinds of issues that will be addressed with testing.

A new question on precision agriculture practices is being added to the Census. This question has not previously been asked and will be included in both cognitive testing and the 2020 Content Test. Testing will include examination of respondents' interpretation of the question and the appropriateness of terminology and examples provided in the question

Several new commodities that were not previously listed on the questionnaire are being added. Respondents who raise these commodities will be included to test whether they are able to understand where and how to report production for these commodities.

The format and layout of several questions where respondents had higher rates of item non-response or were edited at higher rates than other items on the form have been changed. Data for these items will be reviewed to evaluate the effectiveness of these design changes.

The 2020 Content Test will also include several tests of changes to the data collection procedures and mail out materials. These tests will include changes to the timing of mailouts and alternative formats and information included in cover

letters, reminder postcards and other mailed materials. The results of these tests will be used to reduce data collection costs and improve data quality by raising response rates.

Omitting this testing would hinder NASS's ability to adequately evaluate and reduce changes considered necessary to improve future Censuses of Agriculture. Ultimately, this would jeopardize the Nation's ability to recognize changing trends in agriculture.

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;**

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.**

The Notice soliciting comments on this information collection was published in the Federal Register on March 31, 2020 on pages 17851-17852. NASS received one public comment, it was from Ms. Jean Public.

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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

NASS held meetings with data users and contacted Federal and State agencies that use Census of Agriculture statistics to evaluate their data needs and to solicit recommendations and justifications on content for the 2022 Census of Agriculture. The proposed Census of Agriculture content was designed on the basis of recommendations received from Federal Government agencies; State departments of agriculture; land-grant universities and colleges; other State agencies; agricultural organizations; the Advisory Committee on Agriculture Statistics; and The Council on Food, Agricultural and Resource Economics (CFARE). Members of the public were also invited to make recommendations for Census of Agriculture content through an on-line submission form accessible on the NASS public website.

The Advisory Committee on Agriculture Statistics is an important contact with data users outside the Federal Government. It makes recommendations regarding all areas of the Agency's agricultural statistics program, with a special focus on the Census of Agriculture. The Committee advises the Agency on current and future data needs, the ability (or willingness) of respondents to supply the desired information, general data collection methods, content and format of Census of Agriculture and survey report forms, and publicity.

- Annual Stakeholder Meeting was held on Tuesday, April 21, 2020 as a virtual meeting. It was free and open to the public.
- USDA Advisory Committee on Agriculture Statistics - Meeting was held on November 14 - 15, 2018, at the Wyndham San Antonio Riverwalk, 111 E Pecan St., San Antonio, TX 78205.

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

No payments or gifts will be provided to sampled operations or 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 and Title 7, Section 2276 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 and NASS contractors comply with OMB Implementation Guidance, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA), (Public Law 107-347). CIPSEA supports NASS' 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 CIPSEA Pledge statement will appear on all future 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>. Response if voluntary.

11. Provide additional justification for any questions of a sensitive nature.

The questions on race and ethnicity comply with the OMB Standards for the Classification of Federal Data on Race and Ethnicity.

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.

The renewal has a sample size of 51,200, a total number of 162,098 responses and a total of 29,622 burden hours.

Average minutes per response for the surveys included in this docket are based on the amount of data asked on each questionnaire and the time needed for respondents to find and report the data. Total hours of burden are shown in the table below.

Cost to the public of completing a questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 29,788 hours are multiplied by \$37.47 per hour for a total cost to the public of \$1,109,936.34.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 31, 2020 for the previous May) to estimate an hourly wage for the burden cost. The May 2019 mean wage for bookkeepers was \$20.65. The mean wage for farm managers was \$38.63. The mean wage for farm supervisors was \$25.25. The mean wage of the three is \$28.18. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$37.47 per hour.

Projected Response Burden Hours for Census Content Testing											
Survey	Estimated Sample Size	Waves of Data Collection	Estimated Responses				Non-response				Total Burden Hours
			Resp. Count	Waves x Count	Min./ Resp.	Burden Hours	Nonresp Count	Waves x Count	Min./ Non Resp	Burden Hours	
Phase 1: Mail & Internet Test (mail late Dec 2020 or early Jan 2020)											
Pre-survey announcement letter/email	36,000	1	3,600	3,600	35	2,100	32,400	32,400	2	1,080	3,180
1st Mail Out - Respond by paper	32,400	1	3,240	3,240	60	3,240	25,920	25,920	2	864	5,994
1st Mail Out - Respond by internet		1	3,240	3,240	35	1,890					
2nd Mail Out - Respond by paper	25,920	1	1,296	1,296	60	1,296	23,328	23,328	2	778	2,830
2nd Mail Out - Respond by internet		1	1,296	1,296	35	756					
Post Card Reminder - Respond by paper	23,328	1	1,166	1,166	60	1,166	20,995	20,995	2	700	2,546
Post Card Reminder - Respond by internet		1	1,166	1,166	35	680					
Additional Mail Follow up	9,000	1	700	700	60	700	8,300	8,300	2	277	977
Phone Follow Up	8,300	1	4,666	4,666	60	4,666	3,634	3,634	2	121	4,787
Publicity Materials	61,920	1	8,136	8,136	5	678	53,784	53,784	2	1,793	2,471
Mail Test Totals	36,000		20,370	20,370		17,172	15,630	106,278		5,613	22,785
Phase 2: Cognitive Interviews (conducted post Mail Test and/or post Internet Test)											
Round 1	100	1	80	80	120	160	20	20	5	2	162
Round 2	100	1	80	80	120	160	20	20	5	2	162
Cognitive Interview Totals	200		160	160		320	40	40		4	324
Phase 3: Internet Test (mail late Dec 2021 or early Jan 2022)											
1st Mail Out	15,000	1	3,750	3,750	35	2,188	11,250	11,250	2	375	2,563
2nd Mail Out	11,250	1	2,250	2,250	35	1,313	9,000	9,000	2	300	1,613
CAWI follow up questions	900	1	900	900	2	30	0	0	0	0	30
NERD follow up questions	400	1	400	400	1	7	0	0	0	0	7
Post Card Reminder	9,000	1	1,500	1,500	35	875	7,500	7,500	2	250	1,125
Publicity Materials	26,250	1	6,000	6,000	5	500	20,250	20,250	2	675	1,175
Internet Test Totals	15,000		7,500	7,500		4,913	7,500	27,750		1,600	6,513

- 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 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 (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.**

Total Content Test costs are estimated at \$3.2 million which includes appropriations for the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) for fiscal year 2020 and the planned budgetary requests for fiscal years 2021 and 2022.

- 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).**

Since the Census of Agriculture Content Test information collection is a reinstatement, there is no current inventory of burden hours. The previous collection, had 65,400 respondents, 45,552 burden hours, and 196,550 responses; compared to the current request of 51,200 respondents, 29,622 burden hours, and 162,098 responses. There are fewer changes to the proposed questionnaire for the 2022 Census of Agriculture that will be tested under this approval, therefore NASS is able to reduce the number of respondents in the sample size as well as the overall burden from the previous tests conducted for the 2017 Census of Agriculture.

- 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 results of the test are not intended for general publication, but rather will result in summary and research reports for internal use only. The material will be evaluated as to methods to improve data collection methods, question wording, and processing of the 2022 Census of Agriculture. Methodological reports may be prepared and presented at statistical or survey methodology conferences.

Timetable for the 2020-2021 Census of Agriculture Content Test

Planning and Development	July 2019 – Dec 2020
Cognitive and Usability Testing (as needed). (Conducted under OMB # 0535-0248)	Feb 2020 – Nov 2020
Mail out Test (Phase 1).....	Dec 2020 – Mar 2021
Evaluate Mail-out Test.....	Apr 2021 – Jun 2021
Follow-up Cognitive Testing (Phase 2, Round 1).....	Apr 2021 – Nov 2021
Internet-Only Test (Phase 3).....	Dec 2021 – Mar 2022
Evaluate Internet-Only Test.....	Apr 2022 – Jun 2022
Follow-up Cognitive Testing (Phase 2, Round 2).....	Feb 2022 – Sep 2022
Finalize Plans for 2017 Census of Ag.....	Jul 2022 – Sep 2022

- 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.**

There is no request for approval of 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 2020

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