

## **SUPPORTING STATEMENT Part A**

### **Pesticide & Fertilizer Survey - Minnesota**

#### **Substantive Change**

**OMB No. 0535-0218**

This substantive change is being submitted as a supplemental supporting statement to the Minnesota Pesticide & Fertilizer Survey.

#### **A. JUSTIFICATION**

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

NASS is requesting a substantive change to the ARMS and Chemical Use Survey docket (0535-0218) to accommodate changes to the Minnesota Pesticide & Fertilizer Survey questionnaire.

The Minnesota Pesticide and Fertilizer Survey is a data collection entirely funded by the Minnesota Department of Agriculture (MDA). The annual project is requested by the Minnesota Department of Agriculture to fulfill its mission under MN Statute 103H.151 where the MDA is required to monitor the effectiveness of Best Management Practices (BMPs) developed by the Department. It states, "The commissioner of agriculture, in consultation with local water planning authorities, shall develop best management practices for agricultural chemicals and practices" and "shall, through field audits and other appropriate means, monitor the use and effectiveness of best management practices developed and promoted under this section." This survey series is the monitoring method. Questions will be asked for each of the following crops: a) corn, b) soybeans, c) all wheat, and d) hay.

Target commodities rotate each year depending on the cooperator's data needs and to avoid targeting the same commodities on the Federally-funded Agricultural Resource Management Survey Phase II. The target commodities for crop year 2019 will be corn and soybeans.

Additional questions will be added for insecticide, fertilizer, and manure management practices for the target crops. Management data will be collected for the largest field producing the target commodity, without manure use. New soil sampling questions are asked for all respondents.

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

MDA will be able to use the additional data to understand the decision making

process when farmers decide to spray insecticides, apply fertilizer and manure to the target crops (corn & soybeans for 2019).

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

The Minnesota Pesticide & Fertilizer Survey is done by Computer Aided Telephone Interview (CATI). The changes to the questionnaires will not impact the use of technology to collect data.

**4. Efforts to identify duplication.**

There are no changes from the original approval related to duplication reduction mentioned in Item 1.

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

NASS incorporated additional screening questions and skip patterns to help minimize additional burden as much as possible.

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

There are no changes to the frequency of these surveys than was originally approved.

**7. Special circumstances.**

No special circumstances are associated with this information collection.

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

Not applicable.

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

No payments or gifts will be given to respondents.

**10. Confidentiality provided to respondents.**

Confidentiality will be provided to respondents in accordance with the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002. All confidentiality protections that are applied to all products released from these surveys will remain the same as originally approved.

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

No questions of sensitive nature will be asked.

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

The following table contains the estimated burden hours for the surveys included in this information collection request. It is anticipated that average respondent burden will increase five minutes per respondent. No additional samples will be selected for this survey. This will result in a burden increase of 560 hours annually. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. The adjusted overall cost to the public is estimated at \$3,917,344.56. Or a net increase in cost of \$16,946.40 due to this change.

	Burden Hours	Estimated Hourly Rate \$	Total Cost \$
Original burden hours for total docket	105,874	\$ 36.84	\$ 3,900,398.16
Increase in burden hours for changes	560	\$ 36.84	\$ 20,630.40
Revised burden hours for total docket	106,334	\$ 36.84	\$ 3,917,344.56

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.**

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

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

MDA provided NASS with \$17,000 to cover the costs associated with these changes.

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

MDA came to NASS wanting to incorporate additional insecticide, fertilizer, and manure management practices questions for the target crops. Management data will be collected for the largest field producing the target commodity, without

manure use. New soil sampling questions are asked for all respondents. The annual questions are requested by the Minnesota Department of Agriculture to fulfill its mission under MN Statute 103H.151 where the MDA is required to monitor the effectiveness of Best Management Practices (BMPs) developed by the Department.

With many of the records already available, and not all operators use insecticides and fertilizers, it is anticipated the amount of additional burden to the respondents to be small. It is anticipated that average respondent burden will increase five minutes per respondent. No additional samples will be selected for this survey. This will result in a burden increase of 560 hours annually.

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

MDA will generate a summary of responses for each question at both the state, pesticide management area, and Nitrogen best management practices region level.

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

No request is being made for approval of non-display of the expiration date.

**18. Exceptions to certification statement.**

No exceptions to the certification statement are requested.

November 2019