

1 Supporting Statement

LIST SAMPLING FRAME SURVEY

OMB No. 0535-0140

This is a request for renewing the approval of the National Agricultural Statistics Service (NASS) List Sampling Frame Survey for another 3 years.

Included in the attachments are sample questionnaires that NASS will be using. The *National Agricultural Classification Survey (NACS)* is used to identify new operators who will be added to our List Frame. If anyone who completes this questionnaire identifies that they produce specialty crops such as floriculture or nursery crops they may receive a follow up interview such as the *Criteria for Horticultural Specialties (CHS)*. This will help to improve the sampling for future floriculture or nursery type surveys. The two step survey process was developed to help reduce respondent burden. Since most US farmers do not produce specialty crops, we removed these commodities from the NACS and limited them to the follow-on questionnaires.

New in 2019, NASS will be attempting to identify new or unknown farm operators through the use of web-scraping. This is being examined to see if it can produce quality agricultural data while helping to reduce data collection costs. The program is called June Area Research Project (JARP) and will use the Agricultural Activity Survey (AAS) questionnaire. This will be tested in four States in 2019.

The *Out of Business Screener (OBS)* will be used in conjunction with other surveys conducted by NASS throughout the year. When a respondent says that they are no longer farming, the NASS enumerator will be prompted to ask these questions to better document the changes in the operators status. If the respondent is no longer a full time farmer, but still has some agriculture activities (hobby or personal use) we will need to determine if they qualify as a point farm (produce or have the potential to produce \$1,000 or more in agricultural products). This follow up survey will only be conducted with telephone interviews.

A. JUSTIFICATION

- 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 objective of the National Agricultural Statistics Service (NASS) is to provide data users with timely and reliable agricultural production and economic

statistics, as well as environmental and specialty agricultural related statistics. To accomplish this objective, NASS relies heavily on the use of sample surveys statistically drawn from the "List Sampling Frame." The List Sampling Frame is a database of names and addresses with control data that contains the component values from which these samples can be drawn.

A broad, yet current, representation of all components of the agricultural sector (small and large farms as well as agribusinesses and specialty farms) is essential in providing accurate statistics for these acreage, production, economic, and environmental surveys. Representation of both small and large farms is also needed to ensure reliable indications for county estimates and to provide a foundation for the Census of Agriculture.

In 1976, Congress appropriated funds for NASS to construct and maintain a List Sampling Frame. A List Sampling Frame system has been developed that includes computer record linkage, automated duplication removal, frame classification, sample selection, mailing, and maintenance. The system is currently operational in all States. Details of our List Frame data can be found in our Systems of Records Notice (SORN) published in the Federal Register.

General authority for these data collection activities is granted under U.S. Code Title 7, Section 2204 which specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain . . . by the collection of statistics . . ."

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.

New names and addresses of potential farms or ranches are obtained on a regular basis from growers associations, other government agencies and various outside sources. New in 2019 NASS will also be collecting names and addresses of potential new farm or ranch operators through the use of web-scraping. This new method of obtaining names will be further tested under the Generic Testing docket (0535-0248) in 2019. Information from these list sources are processed through, and reviewed through a record linkage system at NASS to eliminate any potential duplication and to obtain a listing of new potential farm records. The "new add" records are then contacted with the NACS which will later be used to classify the records according to specific data (size of operation, total acres operated, crop acres, types of livestock, etc.). This information is utilized to define population counts for the various types of farms or ranches (hogs, cattle, equine, crops, specialty agriculture, etc.) and adjust the list frame for under coverage. Additionally, this information will be used to create both probability and non-probability samples for the numerous surveys conducted by NASS.

All types of farms and ranches are represented on the NASS List Sampling Frame. In order to be able to create efficient samples with desired precision of estimation, control data must be kept current and complete. This is especially true for specialty commodities such as fruits and vegetables. Operators who identified themselves as a producer of certain specialty items such as nursery or floriculture crops could also receive the CHS as a follow up specialty criteria survey, which will ask specific items of interest for each respective State.

Records with old or missing control data can also be included in the NACS to keep control data current. Old or missing control data can lead to incorrect inclusion in or exclusion from samples and to inefficient stratification. Also, another important function of up to date quality control data are for non-response weighting during the Census or Survey process.

- 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 NACS and AAS questionnaires will be available on the internet. The majority of the data is collected using self-administered questionnaires, i.e., questionnaires sent to the respondent by mail along with internet instructions if available. In 2016 there was a 15% response rate by internet. If the respondent does not respond by either the internet or the paper form, we will attempt to collect the data by telephone provided that funding is available.

All versions of the questionnaires (internet, paper and Computer Assisted Telephone Interview (CATI)) use skip patterns that move the respondents through the questionnaire as quickly as possible.

- 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.**

New names and addresses of potential farms or ranches are obtained on a regular basis from growers associations, other government agencies and various outside sources. Information from these new list sources are processed through, and reviewed through a record linkage system at NASS to eliminate any potential duplication and to obtain a listing of new potential farm records.

The National Agricultural Statistics Service cooperates with State departments of agriculture, land grant universities, and other State and Federal agencies to conduct agricultural surveys. Surveys meet both State and Federal needs, thus

eliminating duplication and minimizing reporting burden on the agricultural industry.

With numerous people entering and leaving the farming industry each year it is crucial that NASS maintains a current list of farm operators to sample from. On each of our surveys that employ a stratified sample, NASS must have an accurate and up to date listing of farmers in order to calculate an accurate expansion or weighting of data to compensate for non-respondents.

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.

In 1975, the USDA, the Office of Management and Budget (OMB), and the U.S. Department of Commerce's U.S. Census Bureau agreed on a definition of a farm that is still in use today. "A farm is currently defined, for statistical purposes, as any place from which \$1,000 or more of agricultural goods (crops or livestock) were sold or normally would have been sold during the year under consideration" (Glossary, 2005). USDA's National Agricultural Statistics Service (NASS) also includes government payments as sales. In other words, a farm is defined as any place with any combination of sales, potential sales, and government payments totaling at least \$1,000. The Small Business Administration describes small farms as farms with less than \$750,000 gross receipts annually. According to the 2012 Census of Agriculture, there were 1,995,839 small farms in the US, or 94.6 percent of all farms.

Most of the respondents to the NACS are relatively small agricultural establishments. Burden is minimized by using the shorter NACS to collect information for most new or potential agricultural establishments. Only information needed to classify an establishment for the basic survey and census of agriculture purposes are collected. Occasionally, if the establishment reports production of specialty commodities or is relatively large in size the CHS may be used for further follow-up. Although in general, the CHS is used for names from specialty commodity list sources which require more specific data.

Out of the annual average sample size of 671,667 an estimated 635,300 will 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.

Generally, the better the relationship between the data used for sample design and the survey data collected, the smaller the sample size necessary to produce reliable estimates. For efficient samples with desired precision of estimation, control data must be kept current and complete. When developing sample

designs, the most important information is (1) the presence or absence of a data item, (2) indication of the age of the data item, followed by (3) some measure of size. This control data determines the usefulness and efficiency of the list as a Sampling Frame. NASS conducts criteria or list building surveys at least annually to maintain a current list sampling frame that is as complete as possible.

Every five years NASS conducts the Census of Agriculture. During that year the criteria or list building surveys are omitted, since the Census data will be used to update the NASS List Frame. The most recent Census of Agriculture referenced the calendar year 2017 and was conducted in 2018. Volume 1 of the 2017 Census of Agriculture will be published on February 21, 2019. The next Census of Agriculture will be conducted in 2023 referencing the calendar year of 2022

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.

The Notice soliciting comments was published in the Federal Register on October 4, 2018 on pages 50067 and 50068. NASS received two public comments in response to this renewal notice. One was from Dr. Dennis Fixler at the Bureau of Economic Analysis (BEA) supporting this data collection. The other was from Ms. Jean Public. The comments are attached to this renewal.

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.

As a part of our regular list building activities, NASS investigates all available lists of farm operators we can access, in order to make our list of potential farmers as complete as possible. Some of the organizations we have received lists from in the past include the USDA Economic Research Service (ERS), the Agricultural Marketing Service (AMS), Environmental Protection Agency (EPA), several State Departments of Agriculture, and some growers associations. These lists are run through careful screening before any names are added to our List Frame to remove any duplication of records.

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

There are no payments or gifts 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>.

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.

The questions asked on the NACS are determined by NASS HQ, since we only use one basic questionnaire version for the entire US. In 2019 NASS will use three very similar version of the NACS questionnaire. The only differences in the three versions involves the screening questions on the front page. NASS is looking at the different format and wording to see if one version is better than another.

Burden hour calculations are shown below. The minutes-per-response figures come from cognitive interviews. 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 141,811 hours is multiplied by \$36.66 per hour for a total cost to the public of \$5,198,791.26.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 30, 2018 for the previous May) to estimate an hourly wage for the burden cost. The May 2017 mean wage for bookkeepers was \$19.76. The mean wage for farm managers was \$38.62. The mean wage for farm supervisors was \$24.11. The mean wage of the three is \$27.50. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will be adding an additional 33% for a total of \$36.66 per hour.

Projected 2019 - 2021 Annual Response Burden Hours for List Frame Surveys												
List Frame Surveys	Sample Size	Waves of Data Collection	Response				Non-response				Total Burden Hours	
			Count	Waves x Count	Min./ Resp.	Burden Hours	Count	Waves x Count	Min./ Non Resp	Burden Hours		
National and State Agricultural Classification Surveys (NACS) 2019 - 2021												
National Agricultural Classification Survey 2019												
First Mailing	450,000	1.00	112,500	112,500	15	28,125	337,500	337,500	2	11,250	39,375	
Second Mailing (non-respondents)	337,500	1.00	67,500	67,500	15	16,875	270,000	270,000	2	9,000	25,875	
Phone Follow Up (non-respondents)	270,000	1.00	94,500	94,500	15	23,625	175,500	175,500	2	5,850	29,475	
National Agricultural Classification Survey 2020												
First Mailing	450,000	1.00	112,500	112,500	15	28,125	337,500	337,500	2	11,250	39,375	
Second Mailing (non-respondents)	337,500	1.00	67,500	67,500	15	16,875	270,000	270,000	2	9,000	25,875	
Phone Follow Up (non-respondents)	270,000	1.00	94,500	94,500	15	23,625	175,500	175,500	2	5,850	29,475	
National Agricultural Classification Survey 2021												
First Mailing	1,000,000	1.00	250,000	250,000	15	62,500	750,000	750,000	2	25,000	87,500	
Second Mailing (non-respondents)	750,000	1.00	150,000	150,000	15	37,500	600,000	600,000	2	20,000	57,500	
Phone Follow Up (non-respondents)	600,000	1.00	210,000	210,000	15	52,500	390,000	390,000	2	13,000	65,500	
JARP Phase 1												
JARP 2019												
First Mailing	100,000	1.00	25,000	25,000	10	4,167	75,000	75,000	2	2,500	6,667	
Second Mailing (non-respondents)	75,000	1.00	15,000	15,000	10	2,500	60,000	60,000	2	2,000	4,500	
Phone Follow Up (non-respondents)	60,000	1.00	21,000	21,000	10	3,500	39,000	39,000	2	1,300	4,800	
Specialty Criteria Survey and Out of Business Screener 2019 - 2021												
Specialty Criteria Survey 2019 *												
First Mailing	10,000	1.00	3,000	3,000	15	750	7,000	7,000	2	233	983	
Second Mailing (non-respondents)	7,000	1.00	2,100	2,100	15	525	4,900	4,900	2	163	688	
Phone Follow Up (non-respondents)	4,900	1.00	2,940	2,940	15	735	1,960	1,960	2	65	800	
Specialty Criteria Survey 2020 *												
First Mailing	10,000	1.00	3,000	3,000	15	750	7,000	7,000	2	233	983	
Second Mailing (non-respondents)	7,000	1.00	2,100	2,100	15	525	4,900	4,900	2	163	688	
Phone Follow Up (non-respondents)	4,900	1.00	2,940	2,940	15	735	1,960	1,960	2	65	800	
Specialty Criteria Survey 2021 *												
First Mailing	10,000	1.00	3,000	3,000	15	750	7,000	7,000	2	233	983	
Second Mailing (non-respondents)	7,000	1.00	2,100	2,100	15	525	4,900	4,900	2	163	688	
Phone Follow Up (non-respondents)	4,900	1.00	2,940	2,940	15	735	1,960	1,960	2	65	800	
Out of Business Screener **												
Phone Only	15,000	1.00	12,000	12,000	10	2,000	3,000	3,000	2	100	2,100	
Totals	2,015,000		1,256,120	1,256,120		307,947	758,880	3,524,580		117,486	425,433	
Annual Averages	671,667		418,707	418,707		102,649	252,960	1,174,860		39,162	141,811	

* The specialty criteria questionnaires are designed to collect more detailed data than what is displayed on the NACS questionnaires. Respondents who reported crops such as fruits, vegetables or horticultural crops will be sent a follow up survey to collect more detailed information. In order to keep respondent burden to a minimum this follow up procedure is designed to only ask the pertinent questions for each individual State. The master questionnaire is attached in the ROCIS system showing the full extent of the commodities that could be asked. The individualized State questionnaires will maintain an average respondent burden of 15 minutes per questionnaire. Operations that produce nursery or floriculture crops will receive the Criteria for Horticultural Specialties questionnaire.

- 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, and any other expense that would not have been incurred without this collection of information.**

The total annual cost to the Federal government for the data collection and summarization associated with the List Sampling Frame is \$7.0 million.

- 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).**

The estimated annual respondent burden of 141,811 hours and 1,593,567 responses is an increase from the previous approval. In 2017 the list building activities were included in the Census of Agriculture docket (0535-0226). In 2018 no list building activities were conducted, since NASS conducted the 2017 Census of Agriculture that year. Only in 2016, was a survey conducted under the previous approval.

In 2019, 2020 and 2021 NASS will be conducting list building efforts each year. In addition operators who identified themselves as greenhouse/nursery operators or fruit/vegetable farmers but did not provide significant details may need to be contacted to see if we can get additional information on the type of crop produced (apples, peaches, pears, etc.) so that they can be properly added to our List Frame. Similarly, operators who reported poultry, but did not specify if they were broiler or layer operations or if they had turkeys may be contacted to add clarity to the data captured to our List Frame. If a more detailed fruit, vegetable or poultry survey is needed, it will be submitted as a non-substantive change to this docket.

In addition NASS is exploring the use of web-scraping as a possible source of finding new operators in 2019.

These combined program changes will add 101,592 burden hours and 1,239,167 additional responses (this includes both completed surveys and refusals or non-responses).

- 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.**

Previously, criteria surveys were conducted throughout the year as States discovered potential new farms that could be added to the List Frame using outside sources. Now the shorter, standardized NACS questionnaire is the primary survey and is conducted once or twice a year and States are encouraged to limit the use of the specialty commodity questionnaires (CHS) to only farmers who have indicated the production of specialty crops (fruits, nuts, vegetables, floriculture, nursery, etc.). The NACS, AAS, and CHS utilize NASS mail centers, and NASS phone centers. There is neither a summarization nor a publication resulting from List Sampling Frame Surveys. Data obtained on the criteria type questionnaires are used by the NASS Frames Maintenance Group in the National Operations Division, in St. Louis, MO to remove duplication and add control data for List Frame sample units. This results in a more efficient Sampling Frame.

- 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.

December 2018