

2021 Supporting Statement – Part A

REQUEST FOR GENERIC CLEARANCE OF MULTIPLE CROP AND PESTICIDE USE INFORMATION COLLECTIONS

from the OFFICE OF PEST MANAGEMENT POLICY

OMB No. 0503 - XXXX

SECTION 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 Office of Pest Management Policy (OPMP) of the United States Department of Agriculture (USDA) requests approval from the Office of Management and Budget (OMB) for generic clearance that will allow OPMP to collect information from agricultural entities. The primary purpose of this information will be to support OPMP's understanding of agricultural practices pertaining to pest management. OPMP is undertaking this effort to satisfy legislative requirements outlined in Title X, Section 10109 of the 2018 Farm Bill, which mandates that The Secretary of Agriculture, acting through the Office of the Chief Economist's Director of OPMP, collect this information.

Pest management information is critical to supporting a key responsibility of OPMP, i.e., to “consult with agricultural producers that may be affected by pest management or pesticide-related activities or actions of the Department or other agencies,” as outlined in the Agricultural Research, Extension, and Education Reform Act of 1998. This request for approval will improve OPMP's ability to better understand the utilization of pest management tools by agricultural producers via input from pest management advisors—including Extension experts and crop consultants, who in addition to being advisors are often agricultural producers themselves. Data collected are intended to capture agricultural practices and needs to support federal activities that pertain to pest management, which are typically time-sensitive and necessitate the need for rapid data collection.

In most cases, the turnaround time for these information collections will be a function of 60-day public comment periods associated with pesticide licensing actions, making it essential for OPMP to promptly administer requests and collect responses. Various factors drive what types of questions OPMP may ask, and although the number of questions asked is fairly limited the scope of potential questions can widely differ depending on the active ingredient in question, what crop the active ingredient is applied to, application methods, and specific target pest problems. Examples of questions include inquiries regarding

pesticide usage, the availability and comparative utility of alternative pest management tactics for target pests, and resistance management concerns.

This effort does not intend to duplicate information collection activities administered by USDA's National Agricultural Statistics Service (NASS) that pertain to pest management. When needed data are current and available through NASS collection efforts, it is OPMP's policy to utilize and recognize such information as Best Available Data.

OPMP envisions that these data would primarily be collected using online questionnaires. In some cases, e-mail, phone-based interviews, and/or focus groups may be necessary. Following standard OMB requirements, OPMP will submit a change request to OMB individually for each project it undertakes under this generic clearance. Respondent questions will be selected from the question bank presented in Appendix A, and OMB will be provided with a copy of questionnaires and all other materials describing the project.

These data will be collected under the authority of 7 U.S.C. 2204(a). Individually identifiable data collected under this authority are governed by section 1770 of the Food Security Act of 1985, 7 U.S.C. 2276, which requires USDA to afford strict confidentiality to non-aggregated data provided by respondents. This Notice is submitted in accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-113) and Office of Management and Budget regulations at 5 CFR part 1320 (60 FR 44978, August 29, 1995).

OPMP will report to OMB on an annual basis a summary of the projects conducted under this clearance.

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.

OPMP is legislatively mandated to consult with agriculturalists that may be affected by pest management or pesticide-related activities or actions of the Department or other agencies. The primary purpose for this information request is to collect information to support OPMP's ability to carry out this mandate. The Environmental Protection Agency (EPA)—as the federal agency with jurisdiction over federal pesticide registration and registration review decisions per the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)—is the main federal entity whose actions can affect agricultural pest management and pest-related activities. For this reason, EPA is the primary agency with which OPMP acts as an intermediary in assembling information on how pest management activities or actions affect agricultural producers.

FIFRA requires that pesticide risks and benefits be balanced, which in certain cases can be complicated by absent, outdated, or unavailable information. Further, in some cases regional nuances exist, such as niche pests or variations in pest species, differing regional production practices, and/or variations in pest management practices. Such differences—despite being critical information for understanding pest management decisions and benefits—are often not distinctly captured by existing pest management information

collections efforts, which tend to focus on annual pesticide usage. Further, these pest management information sources often do not survey small acreage specialty crops. These factors create a need for a pesticide usage information collection effort that not only can better understand specific pest management decisions, but also provides a platform for representing all agricultural producers, regardless of industry size.

These information collections may extend beyond the scope of FIFRA, as USDA and other agencies in some cases participate in pest management or pesticide-related activities. Historically, however, such occurrences have been rare and there is no indication that there will be an increase in these instances during the three-year duration of this information collection request.

Procedures for Information Collection

OPMP has longstanding working relationships with agricultural experts, such as university Extension specialists and representatives from crop consultant associations. This cohort of experts makes up the target respondents for this information collection, as both of these groups provide technical advice to agricultural producers. Many of these experts are also agricultural producers, and often satisfy certification experience requirements with their ongoing farm production activities. Further, OPMP has the means to contact the entire population of University agricultural specialists (including Extension experts), American Society of Agronomy Certified Crop Advisors (CCAs), and crop consultants associated with the National Alliance of Independent Crop Consultants (NAICC), allowing for a census-like study. Given that a primary goal of this information collection is to ensure that niche use and usage needs for pest management tools are accounted for, ideally responses across the entire population of potential respondents can be captured.

To reduce burden to the greatest extent possible, sub-census populations of Extension specialists and crop consultants will be contacted. For example, in the case of Extension specialists, if an information collection need is specific to herbicide usage on a particular crop, then only specialists that are both agronomists and that are located in states in which that crop is grown will be contacted. Additionally, in many cases the states that crop consultants operate in and the crops that they consult for is known, again allowing for sub-census level outreach. Throughout the life of this data collection, OPMP will continuously develop and update research panels to more accurately target appropriate sub-census populations.

Allowable Information Collection Methods

The list below includes allowable collection methods under this generic clearance. Depending on the needs of each specific information collection and the population(s) being surveyed, it may be necessary to combine one or more of the methods described below. It is assumed that most collections will be implemented via web-based surveys, although other methods, such as telephone surveys, interviews, and/or focus groups may be needed under certain circumstances.

Web-based and social media-based surveys:

Web-based surveys and surveys administered via social media are generally more convenient to the respondent, as he or she can complete the survey when they choose. OPMP plans to work with a third-party online research software vendor and is currently collaborating with USDA's Office of the Chief Information Officer (OCIO) in identifying vendors that meet USDA's software and security criteria to ensure the protection of respondents Personally Identifiable Information (PII). The name and credentials of the vendor(s) will be included in the subsequent supporting statements, issued prior to each data collection.

Links to the surveys may be posted on websites, including social media websites, or may be sent to respondents via e-mail. In addition, OCIO's current bid for vendors includes a requirement that surveys be accessible via a smartphone application. If respondents' e-mails are available, Dillman's "Tailored Design Method" will be used as time allows to develop a procedure for following up with respondents. In some cases, due to constraints created by EPA's 60-day comment periods, the second and final follow-up requests using Dillman's "Tailored Design Method" may have to occur prior to the typical four- and eight-week follow-up durations.

Telephone surveys:

If respondent telephone numbers are available, telephone surveys may be used either alone or in combination with some other method. This method also may be used if there is reason that additional feedback is needed for specific regions or for respondents located in inaccessible or broadly dispersed locations. Dillman's "Tailored Design Method" will be adopted and an approved number of attempts using this method will be made to reach each respondent. If this method of collection is used, trained interviewers will be utilized and provided with an explanation of the collection effort and its importance and the use of the collected responses. The interviewer will then move through the questions. If the interviewer fails to reach the respondent, the interviewer will follow the approved process to reach the next contact.

Structured Interviews:

In some cases, further information from specific respondents may be sought via interviews. While this method does not allow for generalization to the larger population, it can result in a rich set of detailed data. Qualitative interview guides (with probes) will be developed to guide these interviews and appropriate data analysis techniques will be used.

Focus groups:

Some data and information are best collected through more subjective, conversational means. Focus groups, which are small, informal group discussions designed to obtain in-depth qualitative information and are most useful in an exploratory stage or when USDA needs to develop a deeper understanding of a particular topic. Individuals will be specifically invited to participate in the discussion, whether in person or through technologically enhanced means (e.g., video conferencing, on-line sessions). Per OMB approval, travel and lodging costs as well as a reasonable payment will be offered to increase participation rates. A trained moderator whose role is to foster interaction will lead

the conversation using a moderator’s guide and will encourage participants to talk with each other about their experiences, preferences, needs, observations, or perceptions. The moderator will make sure that all participants are encouraged to contribute, and that no individual dominates the conversation. Furthermore, the moderator will manage the discussion to make sure it does not stray from the topic of interest. The focus groups may be segmented, as necessary, according to a key variable of interest to the study, but within each segment the groups will be constructed to include a cross-section of users.

Allowable Information Collection Topics and Questions

USDA will limit the topics and questions presented to respondents to those supplied in the question bank (see Appendix A). The questions included in the question bank are primarily a function of questions that were asked in the past by OPMP to nine or fewer respondents, in accordance with the Paperwork Reduction Act. Every collection will request basic demographic information that will be identical across collections, which are indicated as such in the question bank. Approximately ten questions will be asked in each collection. The response options for these questions will vary depending on the collection to account for variables such as differing cropping systems, geographic regions, and pesticide types.

The questions included in the question bank can be broadly categorized. Table A-1 provides an overview of these categories. In cases where questions arise that are outside the scope of the question bank, OPMP will limit outreach to nine or fewer respondents and will keep record of questions that need to be added to the question bank for future information collection renewals.

Table A-1. Overview of Question Categories

Category	Number of Requests	Percentage of Total
Alternative Pesticides and/or Pest Management Measures	27	9%
Application Method	31	10%
Application Rate	31	10%
Application Timing	3	1%
Biology	3	1%
Economic Considerations	11	4%
End Products	1	<1%
Geographic Considerations	17	6%
Local Regulations	1	<1%
Miscellaneous	5	2%
Niche Uses	2	1%
Number of Applications	22	7%
Pesticide Benefits	33	11%
Pesticide Formulation	9	3%
Pesticide Use & Usage	34	11%

Category	Number of Requests	Percentage of Total
Production Practices	21	7%
Request for Expert Contacts	3	1%
Tank Mixing	3	1%
Target Pests	39	13%
Worker Considerations	7	2%
Total	303	

A great deal of diversity is expected regarding the types of crops that will be researched. Reflecting on historical OPMP information requests to nine or fewer respondents from 2016 to 2018, more than 85 crops were covered (see Table A-2). Note that nearly three out of four information collections were for specialty crops and/or minor use crops (less than 300,000 acres grown annually).

Table A-2. Types of Crops Included in EPA Requests to OPMP

Crop	Number of Requests	Percentage of Total Requests
Alfalfa	1	1%
Almonds	1	1%
Apples	3	2%
Apricots	1	1%
Asparagus	2	1%
Avocados	1	1%
Bananas	1	1%
Beans, Green	2	1%
Beets	1	1%
BLM Lands (rangeland)	1	1%
Blueberries	2	1%
Broccoli	1	1%
Cabbage	2	1%
Caneberry: Blackberry	2	1%
Caneberry: Raspberry	2	1%
Canola	1	1%
Cantaloupes	1	1%
Carrots	2	1%
Cattle	2	1%
Cauliflower	1	1%
Celeriac	1	1%
Celery	1	1%
Cherries	2	1%
Christmas trees	1	1%
Cilantro	1	1%
Citrus	3	2%
Coriander	1	1%
Corn, field	5	3%
Corn, sweet	5	3%

Crop	Number of Requests	Percentage of Total Requests
Cotton	5	3%
Cranberries	2	1%
Cucumbers	2	1%
Dill	1	1%
Dry beans/peas	2	1%
Eggplant	1	1%
Forestry	4	3%
Ginger root	1	1%
Grapefruit	4	3%
Grapes	2	1%
Greenhouse, nursery, & ornamental production	5	3%
Hay	1	1%
Herbs	1	1%
Horseradish	1	1%
Hybrid poplar	1	1%
Lemons	4	3%
Lettuce	2	1%
Mint	1	1%
Mustard	1	1%
Nectarines	1	1%
Olives	1	1%
Onions	1	1%
Oranges	4	3%
Organic uses	1	1%
Parsley	2	1%
Parsnip	1	1%
Peaches	2	1%
Peanuts	1	1%
Pears	2	1%
Pecans	1	1%
Peppers	1	1%
Pineapple	1	1%
Pistachios	1	1%
Plantains	1	1%
Potatoes	3	2%
Poultry houses	3	2%
Prunes	1	1%
Pumpkins	1	1%
Radish	1	1%
Rice	1	1%
Sod	2	1%
Sorghum	3	2%
Soybeans	2	1%
Spinach	1	1%
Squash	1	1%
Strawberries	1	1%
Sugarcane	1	1%
Sugar beets	4	3%
Sunflowers	1	1%

Crop	Number of Requests	Percentage of Total Requests
Sweet potatoes	2	1%
Swine facilities	1	1%
Tangelos	4	3%
Tangerines	4	3%
Tobacco	1	1%
Tomatoes	2	1%
Tree nuts	1	1%
Walnuts	1	1%
Watercress	1	1%
Watermelons	1	1%
Wheat	2	1%
Total	158	

Information collections to nine or fewer respondents that are not specific to a crop are not fully reflected in this table, such as information requests for non-bearing fruit, organic production, and small seed vegetable crops. Source: Internal OPMP calculations.

A need may arise to collect pest management information for other purposes, such as to assist OPMP in better understanding the presence of resistant pests. Questions will be limited to those presented in the question bank and a change request, including a copy of the questionnaire and all other materials describing the project, will be submitted to OMB for each individual project undertaken.

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.**

OPMP will employ information technology, as appropriate, to reduce the burden on respondents who agree to participate. OPMP may also explore the use of technologies (e.g., satellite TV or the Web) to conduct focus groups and other appropriate uses of technology, as yet unknown, to reduce burden on respondents. Web surveys have the potential to facilitate respondents' data entry by performing automated tabulations and by providing feedback regarding errors in the reported data. These features potentially reduce the need for follow-up contact with respondents.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

These information collection requests are being undertaken to answer questions that have not yet been addressed or answered by other information collection efforts or that are not current enough to satisfy an information need. Other major sources of information for pest management practices and pesticide use and usage data are USDA's National Agricultural Statistics Service (NASS), the California Department of Agriculture's Pesticide Usage Report, and third party proprietary data providers. In some cases, information is available through information collection efforts administered by agriculturally affiliated associations.

To ensure duplicate questions are not being asked of growers and other agriculturalists, prior to any information collection OPMP will explore NASS datasets using NASS' online QuickStats tool (e.g., Chemical Use Surveys and Agricultural Resource Management Surveys, etc.). Special tabulations and/or NASS data lab exploration will be used for pest management questions that are not captured in QuickStats. Data from proprietary companies for which USDA holds subscriptions will be checked prior to an information collection. If replicate information is found via any of these sources that is considered current and valid, OPMP will not ask duplicate questions without providing justification to the Office of Management and Budget's (OMB) Office of Information and Regulatory Affairs (OIRA).

Survey instruments and final reports will be made publically available on OPMP's website. In addition, the collected data will also be archived using databases that are in compliance with USDA's data security requirements to ensure the confidentiality of these data. The primary purpose of publically posting survey instruments and final reports as well as internally archiving data is to reduce the duplication of efforts and public burden. Further, to reduce redundancy and increase transparency, OPMP plans to not only notify relevant agricultural groups prior to information collection requests occurring for their crops but will also produce a notification of final reports being made publicly available.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

OPMP estimates that approximately 75% of the 12,495 crop consultants being surveyed, or approximately 9372 crop consultants, could be classified as small businesses or small entities. OPMP will minimize the burden on these respondents by using the smallest possible number of questions to collect the information that is necessary. Beyond basic demographic questions, approximately 10 questions will be included in each collection effort. Electronic collection methods will be utilized to reduce respondent burden.

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 primary consequence from not conducting this information collection is that it would deny the agricultural industry the ability to afford important and insightful input towards a better understanding of pest management practices that may be unknown by the federal government; this consequence is especially valid for underrepresented specialty crops. The information collection effort at hand is designed to gauge the existence of exceptions to blanket assumptions about benefits and pesticide usage. As described previously, in the status quo OPMP collects this information but is limited to nine or fewer responses to be in compliance with the Paperwork Reduction Act (PRA); this dramatically limits the usefulness and robustness of the information that OPMP is able to collect. Given this restriction, often entire regions cannot be represented even with a single response, which is of high consequence to understanding potential impacts from weather conditions,

resistance development of pests to pesticides, agronomic practices, and pest pressures—which amongst many other variables, can greatly vary regionally. Further, in some cases OPMP has not been able to seek information across all potentially affected agricultural systems, which can lead to holes in the office’s understanding of pest management usage and benefits. Expanding the scope of OPMP’s ability to reach out to more than nine respondents and addressing all potentially affected agricultural systems will greatly increase both efficiencies and the quality of information collected.

7. 1 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;

In most cases, given that registration review actions are typically released for public comment on a quarterly cycle, information will be collected quarterly. Prior to an information collection request, OPMP will review both registration review actions and/or other pest management data collection needs to determine how questions across different activities may be combined into one quarterly information collection to reduce respondent burden.

Some situations in which information collection is necessary but falls outside of the quarterly registration review public comment periods may occur. Examples of situations that could arise include but are not limited to variability in registration review schedules; special releases, such as guidance; and general collections of information that span across multiple active ingredients and/or cases. OPMP will make every effort possible to reduce the number of times information is requested throughout the year.

There are no other circumstances.

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 of this request appeared in Volume 85, Number 60, of the Federal Register, on pages 17304 to 17306, on Friday, March 27, 2020. The comment period closed on May 26, 2020 and two comments were received, one from the National Cotton Council (NCC) and from an anonymous Extension professional.

Both comments were supportive of the notice. The NCC stated that “the proposal is necessary and the information collected will have practical utility.” The Extension professional stated, “I believe the OPMP is doing a good thing by proposing these surveys because there is a lack of data in these areas, despite the good work that NASS does.”

However, both comments also expressed concerns about the burden associated with the data collection effort or the language used in the notification. For instance, while the NCC

“finds no obvious fault with the agency’s estimate of the burden for collecting the information,” they “believe the agency needs to be aware that “during ‘busy seasons’ in agriculture, the proposed respondents will have less time to spend on responding to these surveys. Therefore, we urge the agency to make the survey process as short and as easy to respond to as possible, such as, for example, some sort of web-based or phone response system.”

The Extension professional believes that OPMP’s assertion that “only one expert/specialist from a land grant university has the knowledge to respond to the types of questions that would be included in the proposed information collection” is inaccurate. Specifically, this individual worries that more than one specialist may have pertinent information, but that the language in the notice may prevent more than one university affiliated specialist from responding to the survey.

OPMP appreciates these comments and the perspectives expressed therein. The NCC’s comment has reinforced OPMP’s commitment to reducing respondent burden by 1) keeping the survey questions short and 2) administering the survey electronically. OPMP has responded to the comment expressed by the Extension professional by modifying its cost estimate of the burden associated with the survey administration. OPMP now assumes that there will be two extension professionals (on average) at each university capable of responding to each data collection.

Notably, OPMP sought feedback from three stakeholders external to USDA: the United States Environmental Protection Agency, the American Society of Agronomy Certified Crop Advisors, and the National Alliance of Independent Crop Consultants. Each of these stakeholders was also broadly supportive of the data collection effort.

Name	Title
Tim Kiely	Acting Deputy Director, Pesticide Re-Evaluation Division, EPA Kiely.Timothy@epa.gov 703-308-882
Allison Jones	Executive Vice President, National Alliance of Independent Crop Consultants allisonjones@naicc.org 423-884-3199
Luther Smith	Director Professional Development and Business Relations, American Society of Agronomy Certified Crop Advisors www.certifiedcropadviser.org 608-2738085

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

Incentives, remuneration, and gifts are generally deemed inappropriate as part of plans for information collections conducted within the scope of this programmatic clearance.

Generally, OPMP will not provide payment or other forms of remuneration to respondents of surveys, questionnaires, and/or comment cards.

There may be extraordinary circumstances however, under which remuneration may be appropriate within the scope of this program. In the case of in-person focus groups, for example, OPMP may seek approval to provide stipends to focus group participants. In the cases of information collections that seek to use incentives, program managers must describe the proposed incentive, how it will be offered to respondents, and provide a justification of its use within the supporting statement, which is required as part of each information collection request under this package.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Respondents in the survey improvement projects will be advised that their participation is voluntary. OPMP will work to maintain the confidentiality of the information so that no organization or individual, or their personal data are released.

All questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees OPMP employees or other federal entities that are permitted to view collected data must read the regulations and sign a statement of compliance (Privacy Impact Statements).

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 personally sensitive information such as religious beliefs, etc. will be collected. Information about pest management practices in some cases can be sensitive business information. For this reason, instruments used for information collection will clearly outline protections being put in place to guard an individual's identity and responses. Public-facing documents will only present summarized results for larger geographic regions (typically the national or state level) to avoid disclosure of an individual's practices. The instrument will also clearly outline protections of individually identifiable data collected governed by section 1770 of the Food Security Act of 1985, 7 U.S.C. 2276, which requires USDA to afford strict confidentiality to non-aggregated data provided by respondents. Outlined in the instrument will also be data security measures being taken and OPMP's compliance with USDA's data security and confidentiality policies.

This survey is voluntary; the instrument will make it clear to potential respondents that participation is at their discretion, but their confidentiality will be safe-guarded.

12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A majority of information collection will be done via surveys hosted on either website or smartphone platforms. Other methods may occasionally be utilized, such as focus groups or structured interviews. As outlined in Table B-1, the total potential universe is 12,777 respondents. This is considered a highly conservative, all-encompassing upper-bound estimate, as it assumes that every potential respondent will receive a request to participate. This is highly unlikely given that sub-census populations that reflect certain crops and/or geographic areas would be contacted. Further, not every member of a respective population is expected to respond. Assuming this universe, however, the total burden hours over the three-year period are not expected to exceed 24,949 burden hours (see Table A-3 below). If USDA chooses to seek a renewal of this Information Collection Request, updated burden estimates based on requests and responses during the three-year life of the Information Collection Request will be supplied to OMB.

For the purposes of estimating and budgeting for the overall 3-year burden for this Generic Clearance, basic assumptions have been made, as outlined in Table A-3 below. Each information collection request submitted under this Generic Clearance will provide the specific estimates of burden related to that particular information Collection request, along with an explanation of how those estimates were determined.

We estimate the maximum total dollar value of the burden hours for this collection (over a three-year period) to be approximately \$954,538, or \$318,179 annually. This figure was arrived at by multiplying the estimated total burden hours over a three-year period (i.e. 24,949 hours) by \$38.26, i.e., the most recently reported average employer costs for employee compensation (as of March 16, 2021).

Table A-3. Burden Hour Estimates for Respondents

Type of Collection	Annual Number of Respondents	Number of Responses per Respondent	Total Responses, Annually	Total Responses, 3-Year	Completion Time	Total Burden Hours, Annually	Total Burden Hours, 3-Year
Surveys ¹ Assume 16 surveys/year (four per quarter) = 48 surveys over three-year period	7,653 respondents	4 responses	30,612 responses	91,836 responses	15 minutes (0.25 hours) for respondents	7,653 for respondents	22,959 for respondents
	5,102 non-respondents	4 non-responses	20,408 annual non-responses	61,224 non-responses	2 minutes (0.03 hours) for non-respondents	612 for non-respondents	1,837 for non-respondents
	12,755	-	51,020	153,060	-	8,265	24,796

	total		total	total		total	total
Focus Groups Assume 1 group/year, or 3 groups over the three-year period (assumes 10 respondents per group)	10	1	10	30	90 minutes (1.5 hours)	45	135
Interviews Assumes 12 interviews per year, or 36 over the three-year period	12	1	12	36	30 minutes (0.5 hours)	6	18
Total	12,777		51,042	153,126		8,316	24,949

1 This will typically be via internet or smartphone surveys but may include telephone surveys. The maximum universe of respondents is 12,777. USDA expects to administer approximately 16 surveys annually based off historical information collection needs targeting nine of fewer respondents (see Question 2), or 4 per quarter for a total of 48 surveys over the three-year period. Through combining questions on survey instruments no single respondent should be contacted more than four times a year. Therefore, as an upper-bound estimate, assuming a 60% response rate, 7,653 responses are expected annually, or 30,612 over the three-year period. 5,102 non-responses are expected annually, or 61,224 during the three-year period. No respondent recordkeeping hours are assumed to be associated with information collection.

2 Assumes 1 group/year, or 3 groups over the three-year period (assumes 10 respondents per group).

3 Assumes 12 structured interviews per year, or 36 over the three-year period.

- 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.**

No capital and maintenance costs to the respondents are anticipated.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The annualized cost to the government is unknown. Each subsequent survey or collection will be developed and designed on a case-by-case basis and will provide an estimate of the cost to the Federal government.

The time committed by OPMP towards this effort is limited by its funding and staff. A majority of this survey effort will be conducted by a GS-14, Step 2 employee, whose time is valued at \$58.71 per hour (per the 2021 OPM General Schedule Salary Table). Using a multiplier of 1.5 [as implied by the previously referenced BLS report] to account for the costs of benefits, the full cost of compensating this employee is \$88.07 per hour, or \$183,186 annually. This staff member is limited to spending 0.5 FTEs, or 1,040 hours, on this effort. This will cost approximately \$91,593 annually and \$274,778 over a three year period.

OPMP has been appropriated \$500,000 for use over a five-year period via the Farm Bill, which requires that this survey effort take place. Less the cost of funds to be allocated to commercial survey companies for survey platforms and/or panel data, the remainder may be used for labor (provided by a AAAS fellow, intern, or grad student funded by a cooperative agreement), which on average would be approximately \$100,000 annually and \$300,000 over a three year period.

Time commitments from OPMP staff that are indirectly involved in this effort are assumed to be limited to one hour per staff person per data collection, which is the typical amount of time staff has spent reviewing data collections in the past. Almost every staff member in OPMP is a GS-15. A GS-15, Step 4 employee earns \$75.97 per hour (per the 2021 OPM General Schedule Salary Table). Accounting for benefits, loaded wage rates are \$113.96. Currently, there are five natural scientists in OPMP who are expected to review the survey questions. The natural scientists' efforts are valued at \$569.80 per survey, of which there are expected to be 16 per year. One hour of managerial labor (provided by a Level V Senior Executive) is required per survey. The sum of these costs is approximately \$10,094 annually (32,820 over the three-year period).

In most cases, four technical GS-13, Step 5 employees (\$84.53/hr loaded wage rate) from EPA will be engaged with this effort (i.e., a Chemical Review Manager (CRM), a social scientist, a biologist, a science information analyst specialist) and four GS-15, Step 5 branch chiefs (\$117.41 loaded wage rate) managing each of the four technical GS-13 employees. Based on estimates from EPA, these individuals have typically spent no more than 1 hour on a specific request. Assuming 16 surveys annually, this equates to \$12,924 annually, or \$38,771 over the three-year period.

The total estimated annual cost to the Federal government is estimated to be \$215,499 annually, or \$646,497 over the three-year period (Table A-4).

Table A-4. Federal Burden Estimates

Agency	Office	Cost Type	Hourly Loaded Wage Rate	Number of Individuals	Total Burden Hours, Annually	Total Burden Hours, 3-Year	Total Costs, Annually	Total Costs, 3-Year
USDA	OPMP	Technical Labor (Survey Administrator)	\$88	1	1,040	3,120	\$91,593	\$274,778
		Technical Labor (Reviewers)	\$114	5	80	240	\$9,117	\$27,350
		Managerial Labor	\$117	1	16	48	\$1,866	\$5,597
		Other Expenses	-	-	-	-	\$100,000	\$300,000
EPA	BEAD	Technical Labor	\$85	3	48	144	\$4,057	\$12,172
		Managerial Labor	\$113	3	48	144	\$5,635	\$16,906

		Technical Labor	\$81	1	16	48	\$1,352	\$4,057
	PRD	Managerial Labor	\$113	1	16	48	\$1,878	\$5,635
Total				15	1,264	3,792	\$215,499	\$646,497

See text for assumptions.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new collection.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Each information collection considered under this generic clearance will describe how the data will be used and will provide to OMB the specific methods used to synthesize, tabulate, and aggregate data collected. OPMP does not plan to make use of these data in statistical analyses beyond simple tabulations for reporting purposes.

For publication purposes, results will be aggregated by geographic regions that correspond to the data need (e.g., state level, corn-belt region, etc.) and to the degree needed to mask individual responses. If desired sample sizes are not reached that would guarantee compliance with 7 U.S.C. 2276, OPMP will notify OIRA as such data cannot be published publically. In such cases, a public notice will be made to notify interested parties about withheld data.

This project is ongoing and will span the entire information collection three-year time period. Publications for each information collection will be made public both on OPMP's website. An annual report of results across all information collection requests for each calendar year will also be supplied to OMB and posted on the OPMP website.

OPMP will strictly follow both requirements set forth by USDA's Office of the Chief Information Officer (OCIO) and standards within the White House's 2001 "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies."

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 valid OMB control number and expiration date will be displayed on all information collection instruments.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

These activities will comply with the requirements in 5 CFR 1320.9.

19. How is this Information collection related to the Customer Service Center?

It is not related.