

**FIELD CROPS PRODUCTION**

OMB No. 0535-0002

**A. JUSTIFICATION**

This is a renewal for a period of three years for a group of long running surveys.

- 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 functions of the National Agricultural Statistics Service (NASS) are to prepare and issue State and national estimates of crop and livestock production, disposition, and prices and to collect information on related environmental and economic factors. NASS conducts probability surveys where possible, as documented in OMB docket No. 0535-0213 (the Agricultural Surveys Program for the major crop commodities such as corn, soybeans, and wheat). Most of the more specialized field crops such as potatoes, tobacco, dried beans, and mint are included in this docket. Because of unique field crop characteristics, such as concentration of a crop in localized geographical areas or the relative importance of the crop, the use of supplemental follow-on surveys is needed. The surveys in this docket use a combination of data collection modes that include mail, telephone, internet, and personal interviews. This data collection approach helps ensure that NASS is publishing accurate, timely data.

Commodity-specific surveys for alfalfa seed, dry beans, dry peas, lentils, mint, special oilseeds, sunflowers (non-oil), popcorn, potatoes, sweet potatoes, sugarbeets, sugarcane, and tobacco are used in those States where better coverage of localized growing areas is needed. Results are published in the next monthly *Crop Production* release. In some States and with certain commodities, it has proven to be more effective if we include commodity price information, stocks and some processing questions on the production questionnaires. This has helped to reduce the frequency at which individual operators are contacted to collect data.

Variety surveys are conducted in several States to estimate acreage planted by wheat, barley, and potato variety. These variety surveys are conducted as part of State cooperative agreements.

The County Agricultural Production Surveys (CAPS) or County Estimates Surveys are conducted each year at the end of the growing season to help estimate field crops acreage harvested and final production at district and county levels. In item A.12. NASS has identified two separate county estimate surveys, small grains and row crops. The small grains survey covers bread and cereal grains. These crops are harvested in the summer months (May – July), so we conduct a county estimate survey following harvest to minimize memory bias. The row crops (corn, soybeans, etc.) are harvested in the fall or early winter, so this data is collected in December and January. The two samples are pulled independently, so it is possible that a farmer could receive both questionnaires if they produce both types of crops.

The weekly Crop Progress and Condition Survey, published in *Crop Progress*, provides timely information about the development and condition of crops between issues of the monthly *Crop Production* release. Questions concerning soil moisture content, insect or disease presence, and the stages of crop production are also asked to better inform farmers of conditions in their region as well as other parts of the country.

The annual Cash Rent Survey samples farmers who have rented land historically on a cash basis. These data will be used to satisfy the requirement originally specified in the 2008 Farm Bill to publish county level cash rent data for both crop land and pasture land.

The annual Wildlife Damage Survey is a reimbursable survey that targets farmers who operate land in the reference year. The objective of the survey is to 1) estimate damage by species, 2) determine what control methods were used for deer, and 3) determine their attitudes toward deer on their property. These surveys are critical in understanding damage caused to crops, deer control measures, and farm operator's perceptions of deer populations. Information provided by farm operators will be used to manage wildlife population at a level that is appropriate for multiple stakeholders.

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

- 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.**

Crop forecasts published in the monthly *Crop Production* report and other releases, are used by farmers, agribusinesses, and many government agencies in

analyzing the nation's production and marketing of field crops and grains. The Secretary of Agriculture uses estimates of crop production to administer farm program legislation and import and export programs.

The weekly crop progress and condition inquiry, published in the *Crop Progress* report every Monday, provides an efficient way for the Department of Agriculture to closely monitor agricultural developments across the country which may affect the nation's food supply. Numerous briefing reports are prepared for the Secretary of Agriculture on crop condition, phenological development, and harvest progress. The reporting of insect and disease damage can alert farmers in other areas to take preventive measures, thus minimizing possible damage. Information on soil moisture and extremes in temperatures can be used to predict potential crop yields. This information is very useful to farmers who are deciding on the appropriate time to sell their crops (through futures markets or through cash sales).

County estimates for field crops are needed by the Farm Service Agency (FSA) and the Risk Management Agency to carry out their respective legislative mandates. Their primary use of the data is to determine average yields by county, used in determining participating farmers' compensation payments. The county-level cash rent survey data enables FSA program payment rates to better reflect market conditions. The information is useful to the Natural Resources Conservation Service (NRCS) for administering programs. The information will also benefit the agricultural sector more generally by enabling the rental market for cropland to operate more competitively.

Variety surveys are used by the Agricultural Research Service (ARS), plant breeders, researchers, and growers to determine the acreage by variety and measure acceptance of new varieties. The impact of insect or disease outbreaks can be measured from variety surveys after the tolerance of a particular variety is determined. Varietal data on wheat are used for determining production and available supplies by class. Class data are of great importance to government analysts and exporters in planning the disposition of U.S. wheat crops since exports comprise approximately one-half of total use.

- 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.**

Nearly all of NASS information collections have been converted to Web-based data collection, what NASS calls electronic data reporting (EDR). Most of the survey instruments for the following commodities have been converted: dry

beans, mint, special oilseeds, potatoes, sugarcane, non-oil sunflower, sweet potatoes, tobacco, and the weekly crop progress and condition report. The remaining instruments that will not be converted are either too infrequent or too impractical to use that mode of data collection. The current proportion of survey responses that were made by Web is at 100.0 percent for crop progress, 4.3 percent for row crop county estimates, 2.2 percent for small grain county estimates, the tobacco price surveys were at 17.0 percent and about 2 percent for the remaining information collections that are available on the internet. This results in an overall Web response rate of 26.4 percent for all surveys included in this docket.

While web reporting is offered to nearly all of our survey respondents, the majority of our respondents do not reply to our surveys using the internet. The Crop Progress survey is an exception due to the target population. Crop Progress targets people who are knowledgeable of the agriculture in their county or district and can report to this survey on a weekly basis. The majority of the people sampled by this survey are County, State, or Federal employees; Agricultural teachers at local schools; or NASDA field enumerators who are also farmers. Since these people have a relatively short time frame in which to respond (weekly) and tend to have convenient access to the internet, they prefer to respond online. With many of our other surveys, farmers may only be selected to conduct a survey once every couple of years and may not have easy access or be familiar with the internet, so they would rather just fill out the paper questionnaire and mail it back in.

Some surveys are conducted on a weekly or monthly basis. NASS will mail out a questionnaire to the respondent with instructions on how to respond by internet or return the questionnaire by mail. If we have not received their response within a few days we must switch over to either phone or personal enumeration. On the majority of our monthly and quarterly surveys the data collection period is limited to approximately 10 days. Using the intense modes of data collection that NASS relies on is the only way in which we can achieve one of our primary directives – the collection and publication of quality data in a timely and useful manner.

The main portal for our on-line surveys is <http://www.agcounts.usda.gov>. Once there, the respondents have to enter the valid survey code and the user ID printed on the label of the questionnaire mailed to them. We do not want anyone other than the selected respondent to access the survey web pages

**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.**

NASS cooperates with State Departments of Agriculture and land grant universities to conduct agricultural surveys. These surveys meet both State and

Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Occasionally some of NASS's Regional Field Offices will ask to have a few additional questions added to their questionnaires to accommodate the needs of their State cooperators and eliminate the need for a separate survey for some of these specialty crops. There is no duplication of questions that are included in the questionnaires attached to this docket except for the quarterly Crop/Stocks surveys (OMB# 0535-0213). The County Agricultural Production Surveys (CAPS) collect data from additional operations on acres planted and harvested along with production data. This supplemental sample is combined with the quarterly data to allow NASS to be able to publish county level data. The samples are carefully compared to ensure there is no overlap.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

Information requested on surveys included in this docket can be provided with a minimum of difficulty by respondents, generally without having to consult their record books.

Out of the estimated sample size of 626,115, approximately 85% or 532,200 are estimated to 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.**

Collecting data less frequently would eliminate information needed to keep the U.S. Department of Agriculture abreast of changes at the State and national level. Timing and frequency of the various reports have evolved to meet the needs of Department clients, including producers, agribusinesses, and government agencies, yet minimize burden on the reporting public.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5CFR 1320.5.**

There are no other special circumstances that would cause the information collection to be conducted in a manner inconsistent with the general information guidelines in 5CFR1320.5.

**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 Federal Register Notice soliciting comments was published on March 30, 2018 on pages 13728 - 13729. One public comment was received from Dr. Dennis Fixler in support of the continuation of this group of surveys. It is attached to this renewal package.

**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.**

Consultations with plant breeders, researchers, growers, industry associations, and other government agencies such as FSA and NRCS are carried out to ensure that data collected reflect all varieties and the proper timing to obtain accurate information.

Throughout the year, numerous NASS statisticians and managers attend private industry and producer's association meetings around the country. They take note of changes within the various industries and update our data collection instruments when possible, to keep our data current and useful to all data users.

**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 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 of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read these 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 is **voluntary**.

All individuals who may access these confidential data for research are also covered under Titles 18 and CIPSEA and must complete a Certification and Restrictions on Use of Unpublished Data (ADM-043) agreement.

**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.**

The following table contains the estimated annual burden hours for this group of surveys. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 188,441 hours is multiplied by \$27.50 per hour for a total annual cost to the public of \$5,182,127.50.

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.

Average completion time per questionnaire is based on time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate and minutes per response shown are the average times for all questionnaires used for the commodity.

Part A, Question 12

Projected Burden for Field Crops (OMB 0535-0002) for 2018 - 2020												
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		
<b>Commodity Specific Surveys</b>												
<b>Alfalfa Seed</b>												
Alfalfa Seed Grower Inquiry <sup>2/</sup>	150	1	120	120	15	30	30	30	2	1		
Grass Seed Forecast - OR <sup>2/</sup>	700	1	560	560	5	47	140	140	2	5		
Alfalfa Seed Cleaners Inquiry <sup>2/</sup>	50	1	40	40	15	10	10	10	2	0		
<b>Dry Beans, Dry Peas &amp; Lentils</b>												
Dry Bean Inquiry (end-of-season - Dec)	6,500	1	5,200	5,200	15	1,300	1,300	1,300	2	43	1,300	
Dry Peas and Lentils (September)	600	1	480	480	10	80	120	120	2	4		
Dry Bean Inquiry (NM) <sup>2/</sup>	20	1	16	16	15	4	4	4	2	0		
<b>Mint</b>												
Mint Grower	500	1	400	400	10	67	100	100	2	3		
<b>Oilseed Crops</b>												
Oilseeds, special	2,100	1	1,680	1,680	15	420	420	420	2	14	420	
Sunflower, non-oil	10	3	8	24	10	4	2	6	2	0		
<b>Popcorn</b>												
Popcorn Grower Inquiry <sup>2/</sup>	150	1	120	120	10	20	30	30	2	1		
Popcorn Processor Inquiry <sup>2/</sup>	15	1	12	12	10	2	3	3	2	0		
<b>Potatoes</b>												
Potato Grower Inquiry (Spring Potatoes)	100	1	80	80	5	7	20	20	2	1		
Potato Grower Inquiry (Summer Potatoes)	250	1	200	200	5	17	50	50	2	2		
Potato Grower Inquiry (Fall Potatoes)	1,100	1	880	880	5	73	220	220	2	7		
Acreage & Disposition (Spring Potatoes)	200	1	160	160	20	53	40	40	2	1		
Acreage & Disposition (Summer Potatoes)	250	1	200	200	20	67	50	50	2	2		



Survey	Estimated Sample Size	Freq	Estimated Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Non Resp	Burden Hours	
<b>Sugar Crops</b>											
Sugarbeets	10	7	8	56	30	28	2	14	2	0	28
Sugar Cane Inquiry	20	11	16	176	15	44	4	44	2	1	45
<b>Tobacco</b>											
Tobacco Price Inquiry	2,200	2	1,760	3,520	10	587	440	880	2	29	616
<b>Variety Surveys</b>											
Wheat and Barley <sup>2/</sup>	35,000	1	28,000	28,000	10	4,667	7,000	7,000	2	233	4,900
Potato Variety Survey <sup>2/</sup>	90	1	72	72	20	24	18	18	2	1	25
<b>County Estimates</b>											
County Agricultural Production Survey (CAPS) Small Grains	85,000	1	68,000	68,000	15	17,000	17,000	17,000	2	567	17,567
County Agricultural Production Survey (CAPS) Row Crops	175,000	1	140,000	140,000	20	46,667	35,000	35,000	2	1,167	47,834
<b>Other Surveys</b>											
Crop Progress and Condition Report (Crop Weather)	4,000	40	3,200	128,000	10	21,333	800	32,000	2	1,067	22,400
Cash Rent Survey	290,000	1	232,000	232,000	10	38,667	58,000	58,000	2	1,933	40,600
Wildlife Damage Survey <sup>2/</sup>	20,000	1	16,000	16,000	25	6,667	4,000	4,000	2	133	6,800
<b>Publicity Materials (Cover Letters and EDR Instruction Sheet)</b>											
All Surveys <sup>3/</sup>	625,915		484,732	487,116	5	40,593	141,183	121,779	2	4,059	44,652
<b>Testing</b>											
Cognitive Testing <sup>3/</sup>	200	1	200	200	30	100	0	0	2	0	100
<b>Total</b>	<b>626,115</b>		<b>500,932</b>	<b>628,116</b>		<b>179,151</b>	<b>125,183</b>	<b>156,979</b>		<b>9,290</b>	<b>188,441</b>

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There is no cost burden to respondents.

**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.**

The total cost to the Federal government to conduct field crop surveys and prepare estimates is estimated to cost approximately \$12 million per year for the next three years, most of which is staff cost.

**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 total burden of 188,441 hours is down 12,478 hours from the current inventory of 200,919 hours. The net decrease is due to a combination of program changes and agency adjustments, which are displayed in the following table. The burden is broken out by survey and by response or non-response. The biggest factors in the decrease are the adjustment of sample sizes due to changes in the population and the discontinuation of several surveys.

The only significant program change that will be made to the upcoming docket will involve several of the dry bean, dry pea and lentil surveys. Several of these surveys have been discontinued as standalone surveys, and the data is now collected through other NASS or FSA surveys. The Dry Bean Cleaner and the Dry Bean Dealer Inquiry surveys have both been incorporated into the Dry Bean Inquiry conducted at the end of the season. The Dry Bean Inquiry that used to be collected in mid-season has been replaced by the monthly Ag Yield survey in conjunction with FSA data. The Dry Bean Planting Intentions have been incorporated into the March and June Quarterly Agricultural Surveys. The dry bean, dry pea and lentil data will still be available in the normal NASS publications, only the source of the data has changed. There was one slight change to Sugarbeets; the frequency was changed from 8 to 7.

Type of Change	Responses		Non-Responses	
	Responses	Burden Hours	Responses	Burden Hours
<b>Program Changes</b>				
Dry Bean Cleaners Inquiry (Discontinued)	(160)	(53)	(40)	
Dry Bean Dealer Inquiry (Discontinued)	(40)	(13)	(10)	
Commercial Bean Seed Survey (Discontinued)	(40)	(13)	(10)	
Dry Bean Planting Intentions (Discontinued)	(800)	(133)	(200)	
Dry Bean Inquiry (mid-season) (Discontinued)	(5,200)	(867)	(1,300)	
Mint Dealer (Discontinued)	(80)	(20)	(20)	
Popcorn Production (Processor) New	12	2	3	
Sugarbeets (Freq changed to 7)	(8)	(4)	(2)	
Tobacco Inquiry (Discontinued)	(100)	(33)	(25)	
Malting Barley (Discontinued)	(2,000)	(333)	(500)	
Fall Agricultural Report (Discontinued)	(2,400)	(800)	(600)	
Subtotal	(10,816)	(2,267)	(2,704)	
<b>Program Adjustment</b>				
Adjustment for Changes to Population Sizes	(14,788)	(9,802)	(3,697)	(
Subtotal	(14,788)	(9,802)	(3,697)	(
<b>Total Changes</b>	<b>(25,604)</b>	<b>(12,069)</b>	<b>(6,401)</b>	
<b>Totals</b>				
	Responses	Burden Hours		
Program Changes	(13,520)	(2,359)		

- 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.**

Questionnaires are mailed out to each person in the target samples for the surveys included in this data collection request. Respondents who do not return their questionnaires by mail or internet will be attempted by phone enumeration. On surveys such as the weekly Crop Progress survey, we encourage the respondents to use the internet to complete the questionnaires due to the very short data collection period. The data are reviewed for reasonableness prior to data processing for editing and summarization. They are summarized by crop reporting districts and the indications are weighted for the State, based on the relative importance of the commodity in the district. State indications are plotted on time series charts which typically comprise 10 years of survey indications and final estimates. Three primary indicators are obtained for each crop: an identical

comparison of current year acreage to the previous year acreage, acreage as a percent of total farmland, and average yield for respondents reporting.

Crop production estimates are issued from Headquarters in Washington, D.C. in the monthly *Crop Production* reports, the January annual summary, June acreage report, or specialty releases as shown in the table below. Crop progress and condition data are published in the weekly *Crop Progress*. State-funded cooperative survey reports may be released from the individual Field Offices as well as in Headquarters publications. The *Weekly Weather and Crop Bulletin* is prepared in cooperation with the National Weather Service Meteorologists, USDA's Cooperative Extension Service, and World Agricultural Outlook Board.

**2018 Field Crops Production Surveys**

Survey	Data Collection Period	Publication	
		Publication Name	Release Date
Alfalfa/Grass Seed	Jan	<i>FO monthly release</i>	Feb - Mar
Dry Beans	Nov - Dec	<i>Annual Summary</i>	January
Mint	Nov	<i>Annual Summary</i>	January
Oilseeds, Special	Nov - Dec	<i>Annual Summary</i>	January
Potatoes	May, Aug, Sept, Nov & Dec	<i>Crop Production</i>	12 <sup>th</sup> of month
		<i>Potatoes</i>	Sep 20
Sugar beets	Mar, Jun, Aug-Nov	<i>Crop Production</i>	12 <sup>th</sup> of month
Sugarcane	Jun; Aug-Mar	<i>Crop Production</i>	12 <sup>th</sup> of month
Sunflower, Non-oil	Mar, Jun, Dec	<i>Prospective Planting and Acreage</i>	Annual
Sweet potatoes	Feb, Jun	<i>Ag Prices</i>	End of month
Tobacco - Price	Feb & May	<i>Ag Prices</i>	End of month
Variety Surveys: Barley	Jan	<i>Variety Summaries</i>	Feb
Crop Progress	weekly Apr-Nov	<i>Crop Progress</i>	Mondays

All NASS publications are available on-line immediately after release at:

<https://www.nass.usda.gov/Publications/>.

Once there, you can select publications by date, subject, keyword, title, release date, etc. Here are links to some of the reports covered by this docket renewal.

National Crop Progress and Condition Reports:

<https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1048>.

Crop Production Releases:

<https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1046>.

Potatoes Annual Summaries:

<https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1123>.

Agricultural Land Values:

<https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo.do?documentID=1446>

Statistics by State for specialty commodities:

[https://www.nass.usda.gov/Statistics\\_by\\_State/index.php](https://www.nass.usda.gov/Statistics_by_State/index.php)

- 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 2018