

## Supporting Statement – Part A

### ORGANIC SURVEY OMB No. 0535 – 0249

The National Agricultural Statistics Service (NASS) of the United States Department of Agriculture (USDA) requests approval from the Office of Management and Budget (OMB) to reinstate Organic Survey information collection for a period of three years.

In 2020, NASS will be conducting the 2019 Organic Production Survey. This first year the survey will be conducted as a follow-on to the 2017 Census of Agriculture. This survey will have a mandatory reporting requirement as authorized under Title 7 Sec. 2204(g) Public Law 105-113. This follow-on survey is conducted once every five years.

In the previous approvals, NASS would also conduct additional organic production surveys in years two and three under this three year approval. These additional surveys have been conducted through cooperative agreements with USDA Risk Management Agency (RMA) and carried a voluntary reporting statement.

The target population for this census consists of all certified organic farms, farms exempt from certification, and transitioning farms. Certified organic farms must meet the qualifications set out by the Agricultural Marketing Service (AMS) of the USDA and be certified compliant by an approved agent of AMS. Farms employing organic practices according to the National Organic Program (NOP) standards but selling less than \$5,000 of organic products are exempt from certification. Transitioning farms have filed a plan and have begun the process of becoming certified organic. The Organic Survey is a census of all target population operations that indicated organic production on their 2017 Census of Agriculture form.

The Organic Survey will be conducted in all 50 States. The respondents will be given various means to report their data including use of our web-based Electronic Data Reporting (EDR) method. Operations will be contacted by mail in early January, with a second mailing in mid-February to non-respondents. Telephone and personal enumeration will be used for remaining non-response follow up. NASS will publish summaries in August at the State level and for each major organic commodity when possible. Some State level data may need to be published on a regional or national level due to confidentiality rules.

#### 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 primary functions of 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, whole farm characteristics, and operator demographics. Timely, reliable, and detailed statistics help maintain a stable economic atmosphere and reduce risk for production, marketing, and distribution operations.

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 statistics ... and shall distribute them among agriculturists."

This census of organic farmers is required by law under the "Census of Agriculture Act of 1997," Pub. Law No. 105-113, 7 U.S.C. 2204(g), as amended. 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 as amended, 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. Law 104-13, 44 U.S.C. 3501, et seq. and Office of Management and Budget regulations at 5 CFR part 1320.

The information is vital to RMA in determining insurance payments to organic farmers. Further, under the 2008 Farm Bill (Public Law 110-246, Section 12023, Part D) some of the duties of the Federal Crop Insurance Corporation (FCIC) are defined as (i) IN GENERAL. The Corporation shall submit to the Committee on Agriculture of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate an annual report on progress made in developing and improving Federal crop insurance for organic crops, including (I) the numbers and varieties of organic crops insured; (II) the development of new insurance approaches; and (III) the progress of implementing the initiatives required under this paragraph, including the rate at which additional price elections are adopted for organic crops.

The Organic Survey will also help to fulfill mandates set forth by the "Food, Agriculture, Conservation, and Trade Act of 1990" (Pub. Law 101-624) and the "Farm Security and Rural Investment Act of 2002" (Pub. Law 107-171) as amended by the "Agricultural Act of 2014" (Pub. Law 113-79).

According to the 2017 Census of Agriculture there were 18,166 farms that produced and sold a total of \$7.28 billion in organic products in 2017.

Food safety and nutrition concerns continue to aid legislators in establishing policies for our Nation's food supply. Accurate measures of non-organic products used to make food have a firm foundation while there is a serious lack of information regarding the Organic sectors contribution to our food supply.

Our nation's consumers are becoming increasingly aware of the impact that quality food has a cornerstone for overall health and quality of life. As more research and studies are conducted there will be a continuing need for an accurate account of what organic production can contribute as a supplement to our overall intake of food products.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The primary purpose of the Organic Survey is to provide acreage, production, and sales data for a variety of organic crop and livestock commodities as well as to gather information on organic marketing practices. These data will be provided by certified organic farms, organic farms exempt from certification, and transitional farms in all 50 States. National and State estimates (when publishable) will be set for all items that are collected on the survey.

Producers, universities, legislators, farm businesses, etc. are in need of organic production and economic data in order to make various important marketing and business decisions. The production of organic commodities can be a very profitable alternative for America's farmers and ranchers and the information gathered will help in the continued orderly development of this expanding agricultural industry.

NASS plans to collect the following organic crop information for acreage in production, quantity produced, quantity sold, and value of sales for field crops, vegetables, fruits, tree nuts and berries. NASS plans to collect information on inventory, quantity sold and value of sales, for organic: livestock, poultry and livestock products. In addition, NASS will collect information on the different marketing practices.

As part of the Organic Farming Initiatives, the data will be used to provide solid production and market data about the supply of key organic commodities. Presently, conventional farmers have access to various types of USDA data for non-organic commodities, while there is no long term, comparable data available for organic producers.

These data will be used to enhance programs like the Environmental Quality Incentives Program (EQIP) by providing accurate, detailed data for agricultural products produced using organic practices. Data will provide valuable information regarding the potential expansion of the Market Access Program to allow for more organic agricultural exports. The Federal Crop Insurance Corporation (FCIC) will use these data to provide better insurance coverage for organic crops.

- 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.**

NASS will use an Electronic Data Reporting (EDR) instrument for soliciting responses to the Organic Survey. The 2014 Organic Production Survey, which was conducted as a follow-on survey to the 2012 Census of Agriculture and had a mandatory reporting requirement, had an 8% online response rate. The 2016 Certified Organic Production Survey which was conducted as a reimbursable survey and had a voluntary reporting statement had a 4% online response rate. With the use of additional publicity materials, NASS is hoping to increase this response rate.

NASS will also be publicizing this survey with:

- Communication Officers of State Departments of Agriculture (COSDA),
- Community Based Organization Workshop,
- USDA Radio,
- RFD-TV (Rural Media Group),
- Attendance at trade shows,
- Social Media (Twitter and Facebook), and
- County Extension Newsletter.

Follow-up telephone interviews and a limited number of face-to-face interviews will be used for data collection of non-respondent cases. NASS will utilize survey management and methodology information technology to target operations that have a higher probability of producing organic products.

- 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.**

The Organic Survey is expected to produce reliable data, that is both current and on a national scale. The first national scale survey that was conducted by NASS was in 2009 for the reference period 2008. The 2011 Organic Survey only collected data for certified producers and had a voluntary response statement. In the 2014 Organic Survey the questionnaire became a little more comprehensive than the 2011 survey because it collected data from certified organic producers, producers exempt from certification, and transitioning producers, similar to the 2009 survey. The 2019 Organic Survey will return to the mandatory reporting and will include certified organic producers, producers exempt from certification, and transitioning producers

Internal committees within USDA that include NASS, Economic Research Service (ERS), Agricultural Marketing Service (AMS), Agricultural Research Service (ARS), Cooperative State Research Education and Extension Service (CSREES), and Natural Resource and Conservation Service (NRCS) have been formed to help coordinate the different aspects of NASS data collection efforts and to eliminate the possibility of duplication of efforts. The Advisory Committee on Agricultural Statistics, appointed by the Secretary of Agriculture, also provides advice on NASS program areas; this committee is composed of a diverse representation of agricultural sector expertise.

**5. 1If 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.**

On July 18, 2019 the Small Business Administration released new guidelines which defines, in 13 CFR, part 121, small agricultural producers as those having annual receipts of no more than \$1,000,000 and small agricultural service firms as those having annual receipts of no more than \$8 million. As all of our survey respondents are subjected to the same level of burden, there is no variance in the estimate of the burden across our expected group of respondents. The estimated breakout of our sample size can be found in the following table.

<b>Organic Operations Based on the 2017 Census of Agriculture</b>		
Total Value of Products Sold	Number of Operations	Percentage
\$99,999 or less	9,580	52.7%
\$100,000 to \$249,999	3,267	18.0%
\$250,000 to \$499,999	2,000	11.0%
\$500,000 to \$999,999	1,304	7.2%
\$1,000,000 or more	2,015	11.1%
Totals	18,166	100.0%
Operations with less than \$750,000 in Sales - 15,500 or 85.3% of total sample.		

**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.**

Under the Agricultural Adjustment Act of 1938 (Pub. Law 75-430) and the Federal Crop Insurance Reform Act (Pub. Law 103-354) as amended through Public Law 113-79; the Department of Agriculture Organic Act of 1944 as amended; and the

Organic Foods Production Act of 1990 as amended, greater emphasis has been placed on the production and marketing of organic crops in the United States. The Risk Management Agency (RMA), the Federal Crop Insurance Corporation (FCIC), the Agricultural Marketing Service (AMS) and numerous other Federal and State agencies rely on the availability of accurate, timely organic data in order to perform their duties. Within this growing sector of farm production, less frequent data collection would greatly impair the accuracy of these other agencies work.

In 2020 the Organic Survey will be conducted as a follow-on survey to the 2017 Census of Agriculture. In 2021 and/or 2022, if external funding is available, then the survey will be conducted again as an annual survey, but the reporting requirement of the respondents will be changed to voluntary. These potential extra surveys may be conducted in order to maintain annual data series. Prior to these additional collections a non-substantive change request will be submitted to OMB to officially change the reporting requirement along with any minor changes that may be made to the questionnaire.

**7. 1Explain 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;**

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 first Notice soliciting comments was published in the Federal Register on February 28, 2019 on pages 6765 - 6766. It was accidentally listed as a revision or extension to an existing information collection. On March 6, 2019 on pages 8071 – 8072 a correction was issued saying that it was a reinstatement of a previous information collection.

1Seventeen public comments were received in response to this notice.

- Alex Wolf – Scoular
- Allison Johnson – Natural Resource Defense Council (NRDC)
- Amelie Lipstreu – Ohio Ecological Food and Farm Association (OEFFA)
- Brian Baker – Cornell University
- David Granastein – Washington State Univ.
- Helga Willer – FiBL Research Institute of Organic Agriculture
- Jamie Ryan Lockman – Montana Organic Association
- Jane Sooby – CCOF – Organic Certification
- Jean Public

- Jessie Bovay – Mercaris
- Johanna Mirenda – Organic Trade Association (OTA)
- Juli Obudzinski – National Sustainable Agriculture Coalition (NSAC), Organic Farming Research Foundation (OFRF), and National Organic Coalition (NOC)
- Kiki Hubbard – Organic Seed Alliance (OSA)
- Kimberly Trevino
- Lucy Norris, Fresh Approach, CA
- Michael Stein – Organic Farming Research Foundation (OFRF)
- Mike Pratt, Organic Vision, LLC

The majority of the comments were favorable for the reinstatement of this collection. Some of the individuals provided very detailed suggestions for changes. The letters and reply letters are attached to this ICR submission.

**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.**

Adam Cline, NASS Census Planning Branch, Census Section, Head, attended the National Organic Standards Board Meeting on April 24-26, 2019 in Seattle, WA. Many of the people and groups that Adam met with at the conference provided feedback and suggestions for change. Most of the comments above came from this interaction.

In addition the Advisory Committee on Agriculture Statistics reviews all of the Census of Agriculture programs and provides recommendations on content, forms design, methodology, outreach, publications, etc. The Committee, appointed by the Secretary of Agriculture, consists of 25 members representing a broad range of interests, including agricultural economists, rural sociologists, farm policy analysts, educators, State agriculture representatives, agriculture-related business and marketing experts, and members of major farm organizations. The committee meets once or twice a year but frequent communication with the members is maintained; the most recent meeting was November 14-15, 2018.

NASS conducted cognitive testing on 7 producers in an effort to improve response and accuracy of data reported. The number of test cases was limited but extensive in scope of production of organic commodities. Furthermore, NASS has solicited input from other agencies and organic institutions in regards to operation practices, marketing, and demographics.

**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 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>.

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.**

No questions of a sensitive nature are anticipated in work conducted under this clearance.



- 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 time required to complete the Organic Survey questionnaire is expected to average 45 minutes per respondent. Time will vary since operations differ in size, scope of production, and practices utilized. Total number of positive responses is estimated to be 20,000, which is based on using an estimated annual sample size of 25,000 with an estimated response rate of approximately 80 percent. The target population consists of certified organic producers, producers exempt from certification and transitional operations. Response burden hours are shown in the table below. There will be a postcard announcement sent out to the target operations announcing the upcoming survey and giving them the opportunity to respond by internet. The next mailing to the respondents will contain the questionnaire, a cover letter, and an Electronic Data Reporting (EDR) mail Instruction sheet. Approximately 2 weeks later a postcard reminder will follow. For non-respondents, the follow up mailing will contain another copy of the questionnaire and a cover letter. NASS will also utilize telephone and personal enumeration to follow up with individuals who do not respond to the mail requests or via EDR. For large or complex operations and those respondents requesting a personal interview in the past, they will be handled by field enumerators early in the process and not be contacted by the numerous mailings.

The estimated annual cost to the public of completing a questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Using the estimated annual reporting time of 19,743 hours is multiplied by \$36.84 per hour for a total cost to the public of \$727,332.12.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 29, 2019 for the previous May) to estimate an hourly wage for the burden cost. The May 2018 mean wage for bookkeepers was \$20.25. The mean wage for farm managers was \$38.43. The mean wage for farm supervisors was \$24.42. The mean wage of the three is \$27.70. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.84 per hour.

Estimated Annual Respondent Burden for Organic Survey												
Survey	Sample Size	Freq.	Responses				Non-response				Total Burden Hours	
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Nonr.	Burden Hours		
<b>Mandatory Surveys (2019)</b>												
<b>Questionnaires</b>												
Organic Survey 1st Mailing	21,250	1	3,825	3,825	45	2,869	17,425	17,425	2	581	3,450	
Organic Survey 2nd Mailing	17,425	1	3,485	3,485	45	2,614	13,940	13,940	2	465	3,079	
Organic Survey Follow-Up Enumeration	13,940	1	8,940	8,940	45	6,705	5,000	5,000	2	167	6,872	
<b>Sub-Total</b>	21,250		16,250	16,250		12,188	36,365	36,365		1,213	13,401	
<b>Publicity Materials for ALL surveys</b>												
Pre-Survey Postcard <sup>3/</sup>	25,000	1	3,750	3,750	46	2,875	21,250	21,250	0	-	2,875	
Reminder Postcard <sup>2/3/4/</sup>	18,925	1	1,500	1,500	46	1,150	17,425	17,425	0	-	1,150	
1st Mailing <sup>1/ 2/</sup>	21,250	1	6,375	6,375	8	850	14,875	14,875	2	496	1,346	
2nd Mailing <sup>1/ 2/</sup>	17,425	1	3,485	3,485	8	465	13,940	13,940	2	465	930	
<b>Sub-Total</b>	25,000		15,110	15,110		5,340	13,940	67,490		961	6,301	
<b>Mandatory Totals</b>	<b>25,000</b>		<b>20,000</b>	<b>21,500</b>		<b>17,527</b>	<b>5,000</b>	<b>75,040</b>		<b>2,174</b>	<b>19,701</b>	
<b>Voluntary Surveys (2020 - 2021)</b>												
<b>Questionnaires</b>												
Quality Control Worksheet (phone only)	500	1	500	500	5	42	0	0		-	42	
<b>Voluntary Totals</b>	<b>500</b>		<b>500</b>	<b>500</b>		<b>42</b>	<b>0</b>	<b>0</b>		<b>0</b>	<b>42</b>	
<b>Overall Totals</b>	<b>25,500</b>		<b>20,500</b>	<b>22,000</b>		<b>17,569</b>	<b>5,000</b>	<b>75,040</b>		<b>2,174</b>	<b>19,743</b>	

<sup>1/</sup> The 1st and 2nd mailings will consist of the questionnaire, cover letter, EDR instruction sheet and return envelope.

<sup>2/</sup> The response rate for the: postcard are 15%, 1st mailing combined with a postcard reminder is estimated at 30%, the 2nd mailing is estimated at 20%, the phone and field enumeration is estimated at 64%; resulting in an overall response rate of 80%.

<sup>3/</sup> Pre-Survey post card burden minutes allows for 45 minutes to complete the questionnaire by internet after 1 minute to read the post card message.

<sup>4/</sup> The postcard reminder will be mailed between the 1st and 2nd mailing of the questionnaire.

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

There are no capital/startup or ongoing operation/maintenance costs associated with this information collection period.

- 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 for the Organic Survey is estimated at \$2,500,000. The approximate cost breakdown is as follows: federal personnel \$1,900,000; NASDA field and phone enumerators \$350,000; and miscellaneous expenses (shipping, handling, printing, postage, travel, etc.) \$250,000.

- 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).**

In 2015 the Organic Survey (referencing 2014) was conducted as a mandatory survey and was a follow-on survey to the 2012 Census of Agriculture. In 2015 NASS targeted certified organic producers, operations that were exempt from certification (sales less than \$5,000) and operations that were transitioning towards organic certification. In 2016 the survey was conducted as a reimbursable survey and had a voluntary response requirement. The sample was targeted at certified organic producers only. In 2020 (referencing 2019) the survey will again be conducted as a follow-on survey to the Census of Agriculture and will reinstate the mandatory reporting requirement. The target population will go back to including certified organic producers, exempt producers and transitional producers. In 2021 and 2022, if funded, the survey will revert back to being a voluntary survey and target only the certified organic producers.

The increase in burden and number of respondents are the result of program changes.

- 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.**

Approximate annual time schedule for the Organic Production Survey:

	<b>Start</b>	<b>Finish</b>
Postcard Mailing	December 2	
Initial Mail-out	December 20	
Reminder Postcard	January 7	
Follow-up Mailing	January 17	
Telephone / Field Follow-up	Mid - January	March
Review, Analysis, and Summary	April	June
Estimation	July	August
Review Tables and Prepare Release	September	
Publication Date	October	

To aid telephone and field follow-up by enumerators, each enumerator will receive an Interviewer's Manual. To aid statisticians in the edit and analysis of reported data, Regional Field Offices will receive Survey Administration Manuals.

Results of the most recent Organic Production Survey are attached to this submission.

- 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.**

No approval is requested for 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.**

No exceptions to the Certification Statement should be required. If so, OMB approval will be requested in advance of conducting the survey.

August, 2019