

Supplemental 1 Supporting Statement Part A

2022 CENSUS OF AGRICULTURE

Substantive Change

OMB No. 0535-0226

TERMS OF CLEARANCE: The NASS research study referenced in the supporting statements is experimental and is intended to assess the impact of including SOGI and Disability questions on survey response rates and measurement error associated with different modes of administration. The findings will inform whether and how to include these questions on the 2027 NACS. These modified survey documents will be included in a substantive change request.

NASS Reply: This is the substantive change request as defined in the Terms of Clearance in the previous approval.

JUSTIFICATION

This submission is for a substantive change request to our approved clearance. This change request provides details for an experimental data collection that will collect data on agricultural decision makers' sexual orientation and gender identity (SOGI) and disability status. This voluntary experimental data collection will be called the *Farm Producer Study* and will take place in late 2021. This experimental data collection was mentioned in the original clearance.

Initially, NASS proposed to test expanded racial categories for Asians, Native Hawaiians/Other Pacific Islanders and additional ethnicity categories for Hispanics in addition to the disability and SOGI questions. The expanded Asian/Native Hawaiian/Pacific Islander/Hispanic categories have been well tested by the Census Bureau and their presence is unlikely to impact response rates. Thus, after further consideration, it became apparent that expanding these questions depended on available space on the Census of Agriculture questionnaire and how the results could be published differentially across the nation to reflect the differential presence of these populations. Neither of these would be well informed by this study. Therefore, we decided it was best to focus on the disability and SOGI questions.

- 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 USDA's National Agricultural Statistics Service conducts the quinquennial Census of Agriculture in years ending in 2 and 7. The Census is the leading source of information about farms and ranches and the people who operate them. It is the only uniform, comprehensive agricultural data set for every state and county or county equivalent in the United States, including detailed data at the county level with respect to race, ethnicity, and gender.

Since acquiring the Census in 1997, NASS has revised and added questions to more fully capture the characteristics of farm producers. NASS now collects data on up to four producers instead of one as in 1997. Questions identifying veterans and new or beginning producers have been added. Beginning in 2017, the roles of women, minority, and other under-served producers have been more fully captured through decision questions, which enables USDA program agencies to measure progress in serving those traditionally underserved against an external benchmark.

NASS is considering adding questions on sexual orientation and gender identity (SOGI) and disability status for the 2027 Census of Agriculture. As a first step in this process, in December 2021, NASS will conduct the *Farm Producer Study* to assess the potential effect of SOGI and disability questions for the Census of Agriculture on response rates and measurement error. The results of the study may lead to a more robust demographic data product and assist regulatory agencies, producers, state governments, processors, and other USDA agencies in administering and monitoring program effectiveness.

USDA agencies with related missions and themes include the Farm Service Agency (FSA) and the Natural Resources Conservation Service (NRCS). FSA administers farm commodity, crop insurance, credit, environmental, conservation, and emergency assistance programs for farmers and ranchers. It uses Census of Agriculture data to determine eligibility criteria for beginning farmer loans; establish targets for increasing lending to beginning farmers, socially disadvantaged producers, women producers; and to target loan funds in the farm ownership and operating programs for applicants from underserved populations. The proposed study data have the potential to help determine baseline numbers for outreach efforts to farmers with disabilities and LGBTQ+ producers.

NASS Census of Agriculture data supports NRCS goals of reducing soil erosion; increasing wildlife habitat; protecting surface water and groundwater; providing incentives for agricultural producers to implement conservation stewardship and environmental protection measures; and increasing lending to LGBTQ+ farmers and farmers with disabilities. These data would also allow NASS to further support other USDA agencies in conducting educational and outreach activities; piggybacking on related activities helps to maximize limited resources and better serve the needs of all producers.

The separate data collection of agricultural decision makers' sexual orientation and gender identity (SOGI) and disability status is also consistent with the *Executive Order on Advancing Racial Equity and Support of Underserved Communities through the Federal Government* and is one step towards responding to requests to the Federal Register Notice associated with this Information Collection Request.

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

No official estimates will be created from the *Farm Producer Study*. Instead, the data will inform future data collections, including the 2027 Census of Agriculture. The summarized results may also be shared broadly, including with other Federal Statistical Agencies and through research reports, journal articles, and presentations at appropriate professional conferences.

- 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.**

Producers included in the *Farm Producer Study* will be able to respond via a computer-assisted web interview (CAWI) or a computer-assisted telephone interview (CATI). Respondents will also be able to respond via a mail-back paper questionnaire.

- 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 will use the same safeguards to remove any duplication of names as approved in the main Census of Agriculture clearance that OMB has already approved.

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

The same questionnaire will be used for both small and large operations. No additional burden will be placed on 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 technical or legal obstacles to reducing burden.**

This experimental study is needed to assess whether collecting SOGI or disability questions impact response rates and to determine whether measurement error is associated with collecting gender identity data if no confirmation question is asked as would occur when the response is via paper questionnaire. The study is not intended for use in policy activities.

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

No special circumstances are 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 5CFR 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 in response to these comments.**

The original notice soliciting comment on this information collection was published in the Federal Register on March 8, 2021 on pages 13279 - 13280.

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 requirements to be recorded, disclosed, or reported.

NASS has met with numerous other agencies who have experience with collecting demographic data from the public or who have subject matter expertise. These individuals include:

Renee Ellis, Census Bureau, Renee.Ellis@census.gov

Jessica Holzberg, Census Bureau, jessica.holzberg@census.gov

Jennifer M Ortman, Census Bureau, Jennifer.M.Ortman@census.gov

Diane Willimack, Census Bureau, diane.k.willimack@census.gov

Valerie Ryan, National Center for Health Statistics, qsq6@cdc.gov

Julie A. Weeks, National Center for Health Statistics, jad3@cdc.gov

James Dahlhamer, National Center for Health Statistics, fzd2@cdc.gov

Stephen Blumberg, National Center for Health Statistics, swb5@cdc.gov

Aneta Erdie, Census Bureau, aneta.erdie@census.gov;

Kirk Greenway, Indian Health Service, Kirk.Greenway@ihs.gov;

Maura Spiegelman, Dept of Education, Maura.Spiegelman@ed.gov

Doug Williams, Bureau of Labor Statistics, Williams.Douglas@bls.gov

Rebecca Morrison, National Science Foundation, rlmorrison@nsf.gov

Christina C. Eller, White House Office of Science and Technology,
Christina.C.Eller@ostp.eop.gov

Sylvia Fisher, Agency for Healthcare Research and Quality,
Sylvia.Fisher@ahrq.hhs.gov

Cristina Miller, Rural Development, Cristina.Miller2@usda.gov

Hanna Breckbill, Queer Farmers Convergences, Humble Hands Harvest
humblehandsharvest@gmail.com

Thomas Worth, USDA, Economic Research Service
thomas.worth@usda.gov

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

No payments or gifts will be given to respondents.

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

There will be no changes in confidentiality from what was approved in the original submission.

11. Provide additional justification for questions of a sensitive nature.

Questions on race and ethnicity comply with the OMB Standards for the Classification of Federal Data on Race and Ethnicity. Operation income is asked in categories so that farms can be categorized by total value of production.

For the experimental data collection study of agricultural decision makers' sexual orientation and gender identity (SOGI) and disability status, findings from the Interagency Technical Working Group (ITWG) on Sexual Orientation and Gender Identity (April 30, 2021) suggested that SOGI questions were not sensitive and had no higher item non-response than other demographic items in household surveys. However, NASS conducted nine cognitive interviews in preparation for this experimental data collection and found the question that asked for the respondent's sex assigned at birth was sensitive and invasive for some respondents. Some respondents also felt the sexual identity question was sensitive. Despite the sensitive nature of these questions, their inclusion is the basis for this experimental data collection.

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.

This substantive change will create a slight reduction in total burden hours from the originally approved totals. The new totals for this information collection request, has a sample size of 4,744,650, a total number of 16,738,427 responses, and a total of 3,267,079 burden hours.

The table below shows estimates of the amount of time needed to complete the questionnaires based on results from the 2020 Census of Agriculture Content Test (OMB No. 0535-0243).

Cost to the public of completing a questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 3,267,079 hours is multiplied by \$36.97 per hour for a total cost to the public of \$120,783,910.63.

NASS uses the Bureau of Labor Statistics' Occupational Employment Statistics (most recently published on March 31, 2021 for the previous May) to estimate an hourly wage for the burden cost. The May 2020 mean wage for bookkeepers was \$21.20. The mean wage for farm managers was \$36.93. The mean wage for farm supervisors was \$25.25. The mean wage of the three is \$27.79. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.97 per hour.

Burden Calculation for 2022 Census of Agriculture and Related Surveys

2022 Census of Agriculture Survey	Sample Size	Waves of Data Collection	Responses				Non-response				Total Burden Hours
			Resp. Count	Waves x Count	Min./Resp.	Burden Hours	Nonresp Count	Waves x Count	Min./Nonr. ^{6/}	Burden Hours	
Screening and List Building (NACS) - US and Native American Versions											
First Mailing	1,350,000	1	472,500	472,500	15	118,125	877,500	877,500	1	14,625	132,750
Pressure Sealed Postcard for Internet Response ^{1/}	777,500	1	38,875	38,875	17	11,015	738,625	738,625	1	12,310	23,325
Second Mailing	738,625	1	221,588	221,588	15	55,397	517,038	517,038	1	8,617	64,014
Phone Follow Up ^{3/}	517,038	1	206,815	206,815	15	51,704	310,223	310,223	2	10,341	62,045
Screening Sub-Total (NACS)^{7/}	1,350,000		939,778	939,778		236,241	410,223	2,443,385		45,893	282,134
Census Questionnaires											
50 States (Two versions of questionnaire US and Hawaii)											
US Forms											
Presurvey Postcard or Autodial (phone call)	3,200,000	1	3,200,000	3,200,000	2	106,667	0	0	1	0	106,667
Pressure Sealed Postcard for Internet Response	3,200,000	1	160,000	160,000	52	138,667	3,040,000	3,040,000	1	50,667	189,334
First Mailing	3,040,000	1	1,064,000	1,064,000	50	886,667	1,976,000	1,976,000	1	32,933	919,600
Incoming Telephone Calls - Out of Scope	50,000	1	50,000	50,000	4	3,333	0	0	2	0	3,333
Second Mailing ^{2/}	1,826,000	1	547,800	547,800	50	456,500	1,278,200	1,278,200	1	21,303	477,803
Reminder postcard ^{8/}	1,278,200	1	191,730	191,730	52	166,166	1,086,470	1,086,470	1	18,108	184,274
Third Mailing	1,086,470	1	271,618	271,618	50	226,348	814,853	814,853	1	13,581	239,929
Pressure Sealed Postcard for Internet Response	814,853	1	40,743	40,743	52	35,310	774,110	774,110	1	12,902	48,212
Fourth Mailing ^{7/}	774,110	1	116,116	116,116	20	38,705	657,993	657,993	1	10,967	49,672
Phone Follow Up ^{3/}	657,993	1	328,997	328,997	50	274,164	328,997	328,997	2	10,967	285,131
Field Enumeration ^{4/}	70,000	1	59,500	59,500	50	49,583	10,500	10,500	2	350	49,933
US Forms Sub-Total	3,200,000		2,830,503	2,830,503		2,382,110	369,497	9,967,122		171,778	2,553,888
Not on Mail List											
Presurvey Postcard or Autodial (phone call)	45,000	1	45,000	45,000	2	1,500	0	0	1	0	1,500
Pressure Sealed Postcard for Internet Response	45,000	1	2,250	2,250	42	1,575	42,750	42,750	1	713	2,288
First Mailing	42,750	1	14,963	14,963	40	9,975	27,788	27,788	1	463	10,438
Incoming Telephone Calls - Out of Scope	2,000	1	2,000	2,000	4	133	0	0	2	0	133
Second Mailing ^{2/}	25,788	1	7,736	7,736	40	5,158	18,051	18,051	1	301	5,459
Reminder postcard ^{8/}	18,051	1	2,708	2,708	42	1,895	15,344	15,344	1	256	2,151
Phone Follow Up ^{3/}	15,344	1	7,672	7,672	40	5,115	7,672	7,672	2	256	5,371
Field Enumeration ^{4/}	2,000	1	1,700	1,700	40	1,133	300	300	2	10	1,143
Not on Mail List Sub-Total	45,000		39,028	39,028		26,484	5,972	111,904		1,999	28,483

2022 Census of Agriculture Survey	Sample Size	Waves of Data Collection	Responses				Non-response				Total Burden Hours
			Resp. Count	Waves x Count	Min./ Resp.	Burden Hours	Nonresp Count	Waves x Count	Min./ Nonr. ^{6f}	Burden Hours	
American Indians											
Presurvey Postcard or Autodial (phone call)	50,000	1	50,000	50,000	2	1,667	0	0	1	0	1,667
Pressure Sealed Postcard for Internet Response	50,000	1	2,500	2,500	47	1,958	47,500	47,500	1	792	2,750
First Mailing	47,500	1	16,625	16,625	45	12,469	30,875	30,875	1	515	12,984
Incoming Telephone Calls - Out of Scope	150	1	150	150	4	10	0	0	2	0	10
Second Mailing ^{2f}	30,725	1	9,218	9,218	45	6,913	21,508	21,508	1	358	7,271
Reminder postcard ^{8f}	21,508	1	3,226	3,226	47	2,527	18,281	18,281	1	305	2,832
Third Mailing	18,281	1	4,570	4,570	45	3,428	13,711	13,711	1	229	3,657
Pressure Sealed Postcard for Internet Response	13,711	1	686	686	47	537	13,025	13,025	1	217	754
Phone Follow Up ^{3f}	13,025	1	6,513	6,513	45	4,885	6,513	6,513	2	217	5,102
Field Enumeration ^{4f}	2,000	1	1,700	1,700	45	1,275	300	300	2	10	1,285
American Indians Sub-total	50,000		45,187	45,187		35,669	4,813	151,713		2,643	38,312
US Territories											
Puerto Rico - Pressure Sealed Post Card for Internet Response	17,000	1	1,700	1,700	52	1,473	15,300	15,300	1	255	1,728
Puerto Rico - Mailing of Questionnaire to Non-respondents	15,300	1	3,519	3,519	50	2,933	11,781	11,781	1	196	3,129
Puerto Rico - Phone In - Out of Scope Operators	500	1	500	500	5	42	0	0	1	0	42
Puerto Rico - Follow-up enumeration	11,281	1	7,897	7,897	50	6,581	3,384	3,384	2	113	6,694
American Samoa - enumeration only	6,400	1	5,440	5,440	30	2,720	960	960	2	32	2,752
Guam - enumeration only	300	1	255	255	30	128	45	45	2	2	130
US Virgin Islands - enumeration only	600	1	510	510	30	255	90	90	2	3	258
CNMI - enumeration only	300	1	255	255	30	128	45	45	2	2	130
US Territories Sub-Total	24,600		20,076	20,076		14,260	4,524	31,605		603	14,863
Experimental Survey - Sexual Orientation and Gender Identity (SOGI), Disability Status, and Expanded Race Survey - "Farm Producer Study" Includes both the Control Group and the Study Group											
First Mailing	75,000	1	26,250	26,250	10	4,375	48,750	48,750	1	813	5,188
Second Mailing	48,750	1	14,625	14,625	10	2,438	34,125	34,125	1	569	3,007
Phone or Field Follow-Up	34,125	1	13,650	13,650	10	2,275	20,475	20,475	2	683	2,958
Farm Producer Study - Sub - Total	75,000		54,525	54,525		9,088	20,475	103,350		2,065	11,153

2022 Census of Agriculture Survey	Sample Size	Waves of Data Collection	Responses				Non-response			
			Resp. Count	Waves x Count	Min./Resp.	Burden Hours	Nonresp Count	Waves x Count	Min./Nonr. ^{6f}	Burden Hours
Publicity Materials for ALL surveys										
Screening Phase										
First Mailing Instruction Letter and EDR Instructions	1,350,000	1	472,500	472,500	5	39,375	877,500	877,500	1	14,625
Second Mailing Instruction Letter and EDR Instructions	738,625	1	221,588	221,588	5	18,466	517,038	517,038	1	8,617
Survey Phase										
First Mailing Instruction letter and EDR instructions	3,220,550	1	1,125,357	1,125,357	5	93,780	2,095,194	2,095,194	1	34,920
Second Mailing Instruction letter and EDR instructions	1,931,263	1	579,379	579,379	5	48,282	1,351,884	1,351,884	1	22,531
Third Mailing Instruction letter and EDR instructions	1,104,751	1	276,188	276,188	5	23,016	828,564	828,564	1	13,809
Fourth Mailing Instruction letter and EDR instructions	774,110	1	116,116	116,116	5	9,676	657,993	657,993	1	10,967
Publicity Materials Sub -Total	4,744,650					232,595				105,469
Quality Control Survey (Telephone Only) - Recontact operators to verify quality of NASDA enumerators.										
Enumerator Quality Control Survey (phone only)	2,000	1	1,800	1,800	5	150	200	200	2	7
Cognitive Testing of SOGI/Disabilit/Expanded Race Pilot Survey										
Testing of new questionnaire (Farm Producer Study)	50	1	50	50	30	25	0	0	2	0
Totals	4,744,650		3,929,147	3,929,147		2,936,622	815,503	12,809,280		330,457

^{1f} After the first mailing of the NACS, about 100,000 operators are expected to be removed from the sample due to being undeliverable by mail.

^{2f} After the first Census mailing, approximately 100,000 long form operators and 10,000 short form operators are expected to be removed from the sample due to being undeliverable by mail.

^{3f} Due to budget and time constraints, phone follow-up will be concentrated on larger operations and those that have a higher probability of being in business.

^{4f} Due to budget and time constraints, field enumeration will be concentrated on larger and/or more complex operations.

^{6f} All mailings contain both the questionnaire and the publicity materials. Burden for each non-response is 1 minute for mail attempts; 2 minutes if an enumerator is involved.

^{7f} The fourth mailing will be a shortened version of the questionnaire, similar to the NACS version used for list building.

^{8f} Burden minutes include 2 minutes for the postcard plus 50 minutes for completing the long form or 40 minutes for completing the short form.

^{9f} The address confirmation letter will be sent in advance of the pre-survey letter. It will target the larger or must records in order to help identify the best contact person for the Census.

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

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

14. Provide estimates of annualized costs to Federal Government; provide a description of the method used to estimate said costs which should include quantifying hours, operational expenses (such as equipment, staff, printing, and overhead), and any other expense that would not have incurred without this collection of information.

There are no changes to the overall costs, from what was reported in the original docket.

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

This is a substantive change to the 2022 Census of Agriculture clearance. In the original approval, the total burden was 3,276,166. This change request involves an adjustment to respondent burden; a decrease of 9,087 hours, to a new total of 3,267,079. This change in burden is due to the new experimental survey's (*Farm Producer Study*) reduced burden minutes. In the original approval the burden was estimated at 20 minutes per interview. After refining the project's specifications and following cognitive testing, the burden was reduced to 10 minutes per interview. The total sample size and number of responses remain the same.

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, include beginning and ending dates for the information collection, completion of report, publication dates and other actions.

The study's data collection of agricultural decision makers' sexual orientation and gender identity (SOGI) and disability status will take place in late 2021. No official estimates will be created from the *Farm Producer Study*. Instead, the data will inform future data collections, including the 2027 Census of Agriculture. The summarized results may also be shared broadly, including with other Federal Statistical Agencies and through research reports, journal articles, and presentations at appropriate professional conferences.

The study will provide insight into how NASS may incorporate these data series into future Censuses of Agriculture and other collections. If these demographic

data are eventually available operationally, they will inform Executive Branch Agencies and Congress on the characteristics of agricultural producers to help identify program deficiencies and enhancements.

- 17. If seeking approval to not display the expiration date for OMB approval of the collection, explain the reasons that display would be inappropriate.**

Approval of non-display of the expiration date is not being requested.

- 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.

September 2021