

Supporting Statement – Part A**LOCAL FOOD MARKETING PRACTICES SURVEY****OMB No. 0535-0259**

The National Agricultural Statistics Service (NASS) is seeking approval for this substantive change request to the 2020 Local Foods Marketing Practices Survey. NASS seeks approval to collect additional information of agricultural products marketed as local foods during 2020. In early 2021, NASS collected detailed data on 2020 local food marketing practices. This information came from farmers and ranchers who had previously reported local food marketing activity on prior surveys and census. Upon reviewing the data, a change in the local food marketing patterns was observed which now requires contacting additional producers to get the complete picture of local food marketing practices. As a result, NASS intends to collect additional information from those not previously indicating prior local food marketings. The November 18, 2021 Local Foods release will be delayed until this information along with data collected earlier this year are combined. This information is expected to be released in the first half of 2022.

This substantive change request is seeking approval to collect data from the additional sample of agricultural operations with unknown local foods activity. Except for the publication date for the results, all other aspects of this Information Collection Request are unchanged from the original approval.

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.**

There is no change to this item from the original approval.

- 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.**

There is no change to this item from the original approval.

- 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.

There is no change to this item from the original approval.

- 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.**

There is no change to this item from the original approval.

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

There is no change to this item from the original approval.

- 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.**

There is no change to this item from the original approval.

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

There is no change to this item from the original approval.

- 8. 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.**

There is no change to this item from the original approval.

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 Provide on the data elements to be recorded, disclosed, or reported.

There is no change to this item from the original approval.

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

There is no change to this item from the original approval.

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

There is no change to this item from the original approval.

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

There is no change to this item from the original approval.

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.

This change request is for an additional sample size of 30,000, a total number of 20,180 responses and a total of 10,799 burden hours. The ratio of burden hours to sample size is lower for the additional sample than for the original approval because the operations in the additional sample are expected to have a low in-scope status, which makes the amount of time needed to respond much less than completing the entire questionnaire, as would be needed for in-scope operations.

Average minutes per response for the surveys included in this docket are based on the amount of data asked on the questionnaire and the time needed for respondents to find and report the data. Total hours of burden are shown in the table below.

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 10,799 hours is multiplied by \$ 36.97 per hour for a total cost to the public of \$399,239.

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.

Projected Burden for OMB 0535-0259

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./ Nonr	Burden Hours	
Out of Scope Operations for Local Foods											
Local Foods Survey (pressure sealed postcard)	29,000	1.00	4,350	4,350	10	725	24,650	24,650	2	822	1,547
First Mailing of Questionnaire	24,650	1.00	2,465	2,465	10	411	22,185	22,185	2	740	1,151
Second mailing of Questionnaire	22,185	1.00	2,219	2,219	10	370	19,966	19,966	2	666	1,036
Third mailing of Questionnaire (if needed)	19,966	1.00	1,997	1,997	10	333	17,969	17,969	3	898	1,231
LocalFoods Survey (follow up enumeration)	17,969	1.00	8,445	8,445	10	1,408	9,524	9,524	2	317	1,725
Publicity Materials mailed with first, second, third mailings and reminder mailing	95,801	1.00	11,031	11,031	7	1,287	66,801	66,801	2	2,227	3,514
Subtotals	29,000		19,476	19,476		4,534	9,524	76,325		5,670	10,204
In Scope Operations for Local Foods											
Local Foods Survey (pressure sealed postcard)	1,000	1.00	150	150	30	75	850	850	2	28	103
First Mailing of Questionnaire	850	1.00	85	85	30	43	765	765	2	26	69
Second mailing of Questionnaire	765	1.00	77	77	30	39	688	688	2	23	62
Third mailing of Questionnaire (if needed)	688	1.00	69	69	30	35	619	619	3	31	66
LocalFoods Survey (follow up enumeration)	688	1.00	323	323	30	162	365	365	2	12	174
Publicity Materials mailed with first, second, third mailings and reminder mailing	3,303	1.00	381	381	7	44	2,303	2,303	2	77	121
Subtotals	1,000		704	704		398	365	2,668		197	595
Total	30,000		20,180	20,180		4,932	9,889	78,993		5,867	10,799

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

There is no change to this item from the original approval.

- 14. Provide estimates of annualized cost to the Federal government; provide a description of the method used to estimate cost which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.**

The total cost to the Federal Government for this substantive change request to the Local Food Marketing Practices Survey is estimated to be \$500,000. This includes federal salaries, enumeration by NASDA staff, printing, postage, data processing, etc.

- 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).**

This substantive change request is seeking approval to collect data from the additional sample of agricultural operations with unknown local foods activity. Except for the publication date for the results, all other aspects of this Information Collection Request are unchanged from the original approval.

- 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.**

The majority of the data will be available in numerous tables located online at the NASS Quick Stats found at:

https://www.nass.usda.gov/Publications/AgCensus/2012/Online_Resources/Local_Food/index.php. Several small summary publications will be printed.

The data will be summarized and published at the US level as well as 7 regional levels and 30 states. This is the same breakdown of the data, as used for the 2015 survey. The highlighted states are the ones that will be published separately when possible. (Based on confidentiality rules.)

REGION 1	REGION 2	REGION 3	REGION 4	REGION 5	REGION 6	REGION 7
Arizona	Connecticut	Idaho	Iowa	Alabama	Florida	Illinois
California	Delaware	Montana	Kansas	Arkansas	Georgia	Indiana
Colorado	Maine	Oregon	Minnesota	Louisiana	Kentucky	Michigan
Nevada	Maryland	Washington	Missouri	Mississippi	North Carolina	Ohio
New Mexico	Massachusetts	Wyoming	Nebraska	Oklahoma	South Carolina	Wisconsin
Utah	New Hampshire	Alaska	North Dakota	Texas	Tennessee	
Hawaii	New Jersey		South Dakota		Virginia	
	New York				West Virginia	
	Pennsylvania					
	Rhode Island					
	Vermont					

The table below contains the projected revised schedule for this survey:

Task	Target Date
Data collection for additional sampled operations	Mid-November – January 2022
Data Analysis	First half of 2022
Publication/Disclosure Review	First half of 2022
Publication Release (Proposed)	First half of 2022

- 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.

October 2021