

Supporting Statement - Part B for OMB 0503-XXXX
**REQUEST FOR GENERIC CLEARANCE OF MULTIPLE CROP AND
PESTICIDE USE INFORMATION COLLECTIONS**

B. STATISTICAL METHODS

Data collection methods and procedures will vary but be limited to the list of known Methodologies approved as part of this generic information collection clearance.

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The potential respondent universe will consist of agricultural experts. In many cases, these experts are also agricultural producers. These experts include Certified Crop Advisors (CCAs) associated with the American Society of Agronomy Certified Crop Advisors (CCAs), Crop Consultants with the National Alliance of Independent Crop Consultants (NAICC), and University agricultural specialists (including Extension experts) that work with or on behalf of agriculturalists, such as farmers, ranchers, nursery operators, animal operations (cattle, chickens, catfish, etc.), foresters, beekeepers, farm managers, farm contractors, extermination and pest control operators, postharvest crop packing and/or processing activities, and/or cotton ginning. Table B-1 presents the estimated number of entities for each strata. OPMP estimates that the total potential respondent universe is 12,755 as an upper-bound estimate.

Table B-1. Estimated Number of Entities within the Respondent Universe

NAICS Code	Type of Entity	Number of Entities
115 - Support Activities for Agriculture and Forestry ¹		12,49
	Private Industry	5
6113 - Colleges, Universities, and Professional Schools (Land Grant Universities Only) ²		26
	State Government	0
Total Potential Respondent Universe	Private Industry	12,495
	State Government	260
	Total	12,755

¹ Using estimates provided by the American Society of Agronomy and NAICC, as of June 2019 there were 11,695 CCAs in the United States and approximately 800 NAICC independent crop consultants. Although some individuals are both CCAs and independent crop consultants, at most the total universe of crop advisors/consultants is 12,495 respondents.

² Of the institutions represented under the North American Industry Classification System (NAICS) code “Universities, and Professional Schools” (NAICS 6113), respondents are limited to land grant universities housing agricultural experts and/or

Extension specialists. Typically, only one expert/specialist from a land grant university has the knowledge to respond to the types of questions that would be included in proposed information collection, with an estimate of 130 such entities existing according to the Association of Public and Land-Grant Universities.

This data collection is a census of crop consultants and extensions professionals. Consequently, sampling is not necessary. To reduce respondent burden to the greatest extent possible, however, sub-census populations will be contacted. For example, in the case of Extension specialists, if an information collection need is specific to herbicides usage on a particular crop, then only specialists that are both agronomists and that are located in states in which that crop is grown will be contacted. Throughout the life of this data collection, OPMP will continuously develop and update research panels to more accurately target appropriate sub-census populations. The specific sub-census research plan for each individual information collection and the method for soliciting participation will be described fully in each individual collection request made under this generic clearance.

At this time, OPMP is unable to predict the expected response rate as this is a new collection. Further, OPMP cannot identify at what proportion of the estimated number of entities within the respondent universe from Table B-1 will be contacted during the three year period. This is a function of multiple factors, including the types of federal pesticide-related actions that may arise during this time period, what crops will be affected, and what geographic areas will be affected. For additional information on the nearly 90 crops for which OPMP requested information from nine or fewer respondents during the 2016-2018 time period, see Table A-2 in Supporting Statement A. OPMP will keep ongoing records to document response rates and any changes in these rates over the three-year period.

OPMP ideally would like to see response rates of greater than 60%, yet rather than placing a focus on high response rates, a more significant effort will be put towards reducing non-response bias. Special emphasis will be placed on providing respondents with transparency around the purpose of the survey; ensuring clear and interpretable survey instruments; and building good relationships with each population from which information is being collected, as their endorsement of the effort is a critical component in garnering ongoing grower participation. Note that participation will be voluntary and time commitments will generally not exceed 15 minutes, though there may be a limited set of cases where participation will require 60-90 minutes (e.g., focus groups).

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,**
- * Estimation procedure,**
- * Degree of accuracy needed for the purpose described in the justification,**
- * Unusual problems requiring specialized sampling procedures, and**
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

OPMP may use a variety of methodologies for these information collections as described in Supporting Statement Part A. Utilized techniques will depend on the objectives of a particular information collection effort. In cases where census or sub-census level information is inappropriate (e.g., focus groups), the list frame or a strata of the list frame will be randomly sampled for the necessary number of respondents.

Commercial, survey-specific software will be the main method for automatically collecting feedback, which may be accessed through the internet or a smartphone application. In some cases, this method could be combined with other collection methods, such as in-person focus groups. All information gathered through various methods of collection will be collated into a single database that meets USDA software and security criteria for sensitive data such that answers from individuals across multiple information collection efforts can be tracked.

All submissions under this generic clearance will fully describe the relevant methodology and will be evaluated to ensure consistency with the intent, requirements, and boundaries of the anticipated generic clearance and to ensure that information-collection procedures are appropriate for the intended uses of the data. All information collection instruments will be designed and deployed based upon acceptable methodologies, where appropriate, and will be used to obtain consistent results, reduce non-response bias, and achieve an appropriate level of response rates for the purposes of this data. Proposed collection instruments and procedures will comply with OMB guidance as described in the OMB publication *Guidance on Agency Survey and Statistical Information Collections* (January 20, 2006).

Data collection methods and procedures will vary and the specifics will be provided with each collection request, including:

- Respondent universe
- How the instrument will be administered to respondents
- Expected response rate
- Strategies for dealing with potential non-response bias
- Planned methods for summarizing the findings

A description of any peer review of the methods and/or instrument will be provided with each information collection. In many cases EPA's Office of Pesticide Programs may be asked to review both the methods and the instrument for each information collection. Grower groups and other agriculturally affiliated groups may also be consulted prior to an information collection to ensure that the instrument is clear and tailored to correspond with a varying cropping systems and/or pest management considerations.

In certain cases, multiple active ingredients may have similar questions that would allow for a single questionnaire to be administered for particular questions. Individual information collection requests for such efforts would likely occur on a less than annual basis. Such efforts would avoid multiple

outreach efforts to the same respondents, reducing respondent and government burden. OPMP will make every effort to organize consolidated information collections, when possible.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

As noted in Question 2, Part A, anecdotal information is adequate for the intended use of this information.

To maximize response rates and deal with non-response, OPMP is taking the following measures:

- OPMP only plans to target sub-census respondents to the greatest degree possible to only request information from relevant agricultural systems. For example, if a registration review proposed decisions is expected to affect cherry production in Michigan, only entities with a cherry affiliation in the state of Michigan will be contacted.
- When reaching out to Certified Crop Advisors (CCAs) and Independent Crop Advisors, the American Society of Agronomy and the National Alliance of Independent Crop Consultants have agreed to partner with OPMP (see Appendix B). These collaborations will not only help OPMP in identifying appropriate sub-census populations for individual information collections but will also help in building rapport and relationships with respondents.
- OPMP will seek to promote response rates by reducing unnecessary outreach/survey fatigue. This is being done via:
 - Combining information collections across multiple actions to be sent out as a single information collection for individual crops for quarterly actions,
 - Exploring ways to combine information collections into one potential information collection across multiple AIs that could address larger, more general blanket questions,
 - Working with other USDA offices and federal agencies to minimize the number of questions asked on any particular information collection,
 - Limiting non-demographic questions to ten or less and limiting questions to those included in the Question Bank (see Appendix A for the complete Question Bank),
 - Reviewing in-house respondent lists prior to any information collection to ensure non-duplicative contacts,
 - Collaborate with social scientists for assistance with the design of questions and survey instruments to reduce non-response bias,

- o Archiving previous responses to ensure question quality and value,
- o In cases where an action is limited beyond crop type, such as by geographic region, OPMP will make attempts to only seek responses from entities within these limited areas, and
- o Continued outreach efforts with grower groups and other agricultural organizations that can act as liaisons and promoters for the effort.

To reduce the collection of unreliable data, OPMP will:

- Limit the universe of respondents to those outlined above in Question 1,
- Review responses to determine if a respondent potentially responded with erroneous information. Any such discussion will be documented in final reports,
- In cases where an error appeared to have been made, OPMP will attempt to reach the respondent for confirmation, and
- When possible, results will be compared with available benchmarks to ensure the validity of the responses.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

Due to prohibitive 60-day turnaround periods associated with registration review, extensive pre-testing will not be possible in most cases. When feasible, OPMP will conduct pre-testing of information collection instruments and procedures.

Additionally, cognitive research will be embedded in the survey instruments. At the end of the information collection process, respondents will be asked to provide feedback on their understanding of and the difficulty of the questions. OPMP will keep internal records on the cognitive quality of questions housed within the question bank, noting instances of differences between different respondent strata, crop types, and regions. Relatively high propensities of non-responses or “don’t know” being selected as a response option will be accounted for and may influence whether or not a question should be revised or dropped.

5. Provide the names and telephone numbers of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

The design of this survey, and these supporting statements, were reviewed twice by staff at NASS:

Name	Title
Daniel Beckler	Branch Chief, National Agricultural Statistics Service dan.beckler@usda.gov 202-720-8858
Dana Butler	Mathematical Statistician, National Agricultural Statistics Service dana.butler@usda.gov 202-690-8627
David Hancock	Survey Statistician, National Agricultural Statistics Service david.w.hancock@usda.gov 202-690-2388

David Hancock reviewed the statistical aspects of the design in November 2019. Dana Butler conducted a second round of review in March 2021. Both statisticians recommended some minor changes to the language in the supporting statements, which have been made. Most recently, Dr. Butler concluded that, “No issues were found with the statistical methods or supporting statements in general.”

The names and contact information of the principal investigator(s) who will collect and analyze the data will be included on all submission forms received under this generic clearance. Each information collection project will be peer reviewed by social scientists and agricultural biologists (e.g., entomologists, weeds scientists, and/or plant pathologists, etc.) that are familiar with pest management practices to ensure valid results for the intent of this effort. OPMP will include the names and contact information of persons consulted in the specific information collection requests submitted under this generic clearance.

USDA will assign their Paperwork Reduction Act (PRA) officer, located within the Office of the Chief Information Officer, to conduct an administrative review of the request and send the submission through its normal peer review channels on behalf of the participating agencies of that Information Collection. The current USDA PRA Officers affiliated with this request are:

Name	Title
Ruth Brown	Departmental Information Clearance Officer USDA Office of the Chief Information Officer
Kimble Brown	Information Clearance Officer USDA Office of the Chief Information Officer

The following representatives (or an equivalent in their absence) from USDA’s Office of Pest Management Policy will be affiliated with this effort and will be reviewing all generic requests and instruments submitted to OMB:

Name	Title
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Sheryl Kunickis	Director USDA Office of Pest Management Policy
Seth Wechsler	Agricultural Economist USDA Office of Pest Management Policy
Julius Fajardo	Plant Pathologist USDA Office of Pest Management Policy
Julie Chao	Regulatory Risk Assessor USDA Office of Pest Management Policy
Clayton Myers	Senior Entomologist USDA Office of Pest Management Policy

In addition, representatives from the Environmental Protection Agency’s Office of Pesticide Programs (OPP) will be consulted prior to the submission of any generic clearance request submitted to OMB. OPMP is actively consulting with OPP regarding this request. In cases, where other federal entities may have an interest in a particular data request (e.g., the Food and Drug Administration, USDA’s Forest Service, etc.), OPMP will attempt to include them in a pre-submission review.