

**AMS RESEARCH COOPERATIVE AGREEMENT SURVEYS GENERIC CLEARANCE**

**From the**

**AGRICULTURAL MARKETING SERVICE (AMS)**

OMB No. XXXX-NEW

**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 legislative basis for conducting direct marketing research is the Agricultural Marketing Act of 1946 (7 U.S.C. 1621-1627). This act broadened the scope of USDA activities to include the entire spectrum of agricultural marketing, including direct marketing. Sec. 203a of the Act states that the Secretary of Agriculture is directed and authorized, “to determine the needs and develop or assist in the development of plans for efficient facilities and methods of operating such facilities for the proper assembly, processing, storage, transportation, distribution, and handling of agricultural products...” In addition, the Farmer-to-Consumer Direct Marketing Act of 1976 supports USDA’s work to enhance the effectiveness of direct marketing. In line with this legislative mandate, the Marketing Services Division (MSD) of USDA’s Agricultural Marketing Service identifies marketing opportunities, provides analysis to help take advantage of those opportunities and develops and evaluates solutions including improving direct-to-customer marketing activities. The Marketing Services Division (MSD) works to improve market access for producers and develop new markets through its three main roles as a researcher, a convener, and a technical assistance provider.

In USDA’s vision, local food producers, markets, and communities have easy access to ideas, innovations, and research to grow and sustain a productive business. This information ensures that opportunities for U.S. food producers are readily available and communities are equipped to successfully grow and sell regionally produced foods, while also supporting its increased access.

Under the Agricultural Marketing Act of 1946, as amended (7 U.S.C. 1621 et seq.), AMS is responsible for conducting research to enhance market access for small and medium sized farmers. Through surveys, the division can identify marketing challenges and opportunities. In the past, research has been

conducted and often becomes outdated due to the timeframe it takes to receive an approval to begin a survey. Much of our work consists of cooperative agreements with land-grant universities to research market access issues related to local and regional food systems. MSD's goal is to explore common challenges that local and regional food system stakeholders face by providing research and data that supports market access and transparency. The bulk of our research is conducted in conjunction with cooperators, mainly land-grant universities, other Federal agencies, State governments, and other organizations. Data collection are a crucial part of our research and providing technical assistance to explore challenges and opportunities related to market access and development in the local and regional food system systems.

This request is for a new generic clearance that will allow AMS to collect information and quickly respond to market access issues related to local and regional food systems. Research methods and information collection will include multiple approaches such as focus groups, interviews, curricula, surveys, and web-based information gathering tools.

In accordance with OMB guidance regarding this generic clearance, we will provide individual memos explaining the exact methods of information collection as well as copies of the tools or instruments for gathering the data with each clearance package.

**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.**

AMS would like to conduct new information collections such as focus groups, interviews, surveys, and web-based information gathering tools conducted by the Marketing Services Division funded through cooperative agreements. AMS works with universities and other entities to research market access issues related to local and regional food systems. Surveys are a vital tool to help determine where to focus research, as well as where AMS should encourage or initiate original research to support the sector. This generic clearance will allow AMS to conduct surveys with cooperating institutions in a timely manner.

Research areas may cover topics such as:

- direct-marketing research
- local food marketing practices
- urban agriculture
- marketing innovation
- various programs and policies to determine their impact on agricultural producers and consumers.
- customer satisfaction
- market research and analysis
- agri-tourism, local foods, or other specific agricultural promotion

programs.

The summarized and published information will be analyzed by AMS, its cooperators and stakeholders in agriculture. Collection of this information will allow AMS to formulate marketing materials and outreach interventions that motivate the target population within the realm of local and regional food systems. Results will be used to study sector developments, release summary statistics, case studies, toolkits, manuals, and additional resources, and to provide technical assistance. These types of materials are essential to advancing AMS education and outreach efforts.

- 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.**

AMS will make every effort to contact all appropriate stakeholders outlined in question 2 above. AMS will use one or a combination of the following appropriate methods to contact and ensure a proper response according to the specific research project:

- mail out paper questionnaire
- online surveys (e-mail, direct links)
- phone
- interviews

AMS makes every effort to comply with the E-Government Act, 2002. For example, focus groups and listening sessions will be accomplished via approved videoconference software. The agency also uses electronic methods to collect feedback from stakeholders, State and local staff and others. When feasible, the agency uses web-based surveys and other online tools and will submit screenshots with the information collection request before the system is activated and deployed and before OMB approval. AMS will indicate how much of the anticipated responses will be submitted electronically through the web-based systems.

- 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.**

Information collection under this package builds on rather than duplicates any prior research. AMS cooperates with State departments of agriculture, land-grant universities, other State and Federal agencies, and other organizations to conduct research. The Agency reviews information acquired through prior

collections, peer-reviewed literature, and other sources. Surveys are designed through consultation with stakeholders to eliminate duplication and minimizing reporting burden on the agricultural industry. Information collected through this generic request will be designed to collect only data that are not available elsewhere. Prior to the implementation of a given survey, every effort is made to determine if the requested information is available from another source.

**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.**

The collection will not have any significant impact on small businesses or other small entities. We anticipate that a significant portion of the respondents will be classified as small businesses, public or non-profit organization. The impact to these small entities for completing our data collection will depend on the nature of the research project. Questions asked in the information collection are primarily focused on data necessary to assist direct-to-consumer enterprises inform their business operations. Information collections such as surveys, interviews, etc., are designed with consultation with stakeholders to eliminate duplication and minimizing reporting burden on the agricultural industry.

**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.**

The surveys in this generic request will be conducted in response to gaps identified by USDA and/or requests from cooperators who have agricultural data needs that cannot be met through other surveys. Results from the surveys included in this general request may be included in reports published by the AMS and/or the cooperator and used in peer-reviewed publications. The findings may also be used by State and local agricultural officials. Without this information, AMS will not be able to complete its core mission of assisting the sector by identifying marketing opportunities, providing analysis to help take advantage of those opportunities, develop or evaluate solutions including improving direct-to-customer marketing activities. This information is crucial for AMS to improve market access for producers and develop new markets through its three main roles as a researcher, a convener, and a technical assistance provider

**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 are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5

8. **Provide a copy and identify the date and page number of publications 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 April 6, 2021 on pages 17767-17768. No comments were received. The 60-day notice published in the Federal Register allows the public and stakeholders an opportunity to comment on this collection.

9. **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.**

There will be a methodology review of the proposed survey that will include input from involved stakeholders. This work will be done prior to seeking OMB approval to conduct the full data collection.

10. **Explain any decision to provide any payment or gift to respondents.**

No payments or gifts are provided to respondents.

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

AMS and its cooperators will follow procedures for assuring and maintaining privacy consistent with the Privacy Act during all stages of data collection. AMS will avoid collecting personal information. However, when appropriate, respondents will be informed that all information will be confidential by the information collection team and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law. Summary statistics and any other additional data released will require explicit consent from respondents. There are no unique confidentiality policies.

12. **Provide additional justification for any questions of a sensitive nature.**

Information collection will not involve questions of a sensitive nature. Questions will focus on direct-marketing and local agriculture production information rather than on personal information about individuals. Published data from the surveys consist of summarized information that does not identify individual respondents.

13. **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 clearance package represents an umbrella clearance for approximately 10 separate information collections, including interviews, focus groups, surveys, etc., per year to be conducted over a three-year period. To create the sampling frames for the surveys, AMS will work with cooperators and stakeholder to build a list frame of potential respondents. The exact number of questions will generally vary; hence, the burden estimates for each survey will vary. Additionally, AMS cooperative research agreements vary on a year-by-year basis according to industry and stakeholder developments. Public reporting burden for this collection of information is estimated to average 15-30 minutes, based on average of 10 information collections per year. AMS will make every possible effort to reduce the burden and cost of each data collection.

Estimated Number of Potential Respondents: 30,000.  
 Estimated Total Potential Annual Responses to all Surveys: 10,000.  
 Maximum Estimated Total Annual Burden on All Respondents: 15,000 hours.

<b>Type of Respondent</b>	<b>Estimate of Population</b>	<b>Total Annual Burden</b>  (hours)	<b>Hourly Wage Rate/ Benefit / Compensation</b>  (dollars)	<b>Total Annual Cost Estimate</b>  (dollars)
<b>First-Line Supervisors of Farming, Fishing, and Forestry Workers</b>	30,000	15,000	\$26.16	\$392,400

This calculation was based on the median wage rate for occupation code 45-1011 (First-Line Supervisor/Managers of Farming, Fishing and Forestry Workers) reported by the Bureau of Labor Statistics, May 2020, (\$26.16 per hour). Generally, all questions asked in the questionnaire refer to data that market managers, operators and market administration staff can be expected to have available as part of their normal routine. Estimates are based on both the

historical numbers of respondents from past projects as well as projections of projects to be conducted over the next three years.

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

There are no capital/start-up or ongoing operation/maintenance costs associated with this generic request. The only cost to respondents will be value of the time spent responding as explained in chart above. AMS will make every possible effort to reduce the burden and cost of each data collection.

**15. 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.**

Different surveys will carry different costs. Total survey costs, including the costs for survey preparation, data collection, data analysis, and report preparation and dissemination, will be provided for each survey when it is submitted to OMB for approval.

However, an estimated cost to the Federal Government will depend on the number of hours Federal employees work on each survey, the number of surveys, and the associated contractor costs. We estimate that Federal employees will spend approximately 500 hours per year overseeing the surveys. Using the hourly wage rate of \$41.78 for a GS-12 federal employee from the 2021 Washington, DC locality pay table, we estimate that it will cost approximately \$62,670 over the three-year approval.

**16. 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 is a new request. There is no current inventory.

**17. 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.**

After each survey is approved by OMB, MSD and its cooperators will begin distributing the questionnaire to the sampled entities. Because each information collection would be tailored to the specific needs of MSD and the interested stakeholders, the data tabulations and analysis would be generated accordingly to best reflect the goals of the survey. A survey approval request would not be sent to OMB without proper consultation with interested stakeholders and

involved cooperators. Reports will describe the research methods used, findings, conclusions, implications, and recommendations that were found through each individual research. After completion of data collection and tabulation, findings may be reported in academic journals, conferences, etc.

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

AMS is not seeking exemption from this requirement.

**19. 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 requested.