

**SUPPLEMENTAL SUPPORTING STATEMENT Part A****FIELD CROPS PRODUCTION****Substantive Change****OMB No. 0535-0002**

This substantive change is being submitted as a supplemental supporting statement to the Field Crops Production docket. This document identifies changes made to the Wheat and Barley Variety Survey that will be conducted in Montana in 2021.

**A. JUSTIFICATION****1. Circumstances making collection of information necessary.**

NASS is requesting a substantive change to the wheat and barley variety survey for the 2021. NASS entered into an agreement with the Montana Wheat and Barley Commission to conduct the Wheat and Barley Variety Survey for crop year 2021. The survey will ask questions on

- Acres of durum wheat, other spring wheat, winter wheat, and barley by variety, as well as
- The respondent's primary factor for choosing a variety to plant,
- The primary agronomic trait, after yield and protein, the respondent uses to determine a variety to plant,
- The respondent's overall impression of the profitability and stability of the operation.

The acreage questions are already included in the approved survey, but the latter three questions are new to help wheat experts in Montana understand what growers in the State expect when choosing which wheat and barley varieties to plant in a given year.

**2. How, by whom, and for what purpose information is to be used.**

There are no changes to the list of potential people who use the data collected by the Wheat and Barley Variety Surveys. The added questions on factors and traits will help wheat experts in Montana understand what growers in the State expect when choosing which wheat and barley varieties to plant in a given year.

**3. Use of improved information technology.**

The wheat and barley variety survey being impacted by this substantive change will be converted over to electronic data reporting (EDR). This is the first year EDR will be used for this survey.

**4. Efforts to identify duplication.**

There are no changes from the original approval related to duplication reduction.

**5. Methods to minimize burden of small businesses.**

Information requested on surveys included in this docket can be provided with a minimum of difficulty by respondents, generally without having to consult their record books.

For the Montana Wheat & Barley Variety Survey, approximately 46 percent of the estimated sample size of 5,300 will be small operations. The over all information collection has a combined sample size of 579,115 with about 84 percent of the sample being small operations.

**6. Consequence if information collection were less frequent.**

There are no changes to the frequency of these surveys that was originally approved.

**7. Special circumstances.**

No special circumstances are associated with this information collection.

**8. Federal register notice and consultation with outside persons.**

Input for the questions other than variety were provided by the following:

Cassidy Marn: Cmarn@mt.gov 406-788-7694  
Executive Vice President of Montana Wheat & Barley Commission,

Charlie Bumgarner bumranch@gmail.com 406-788-1216, and

Mike O'Hara Oharafarms@3rivers.net 406-899-6903

**9. Payments or gifts to respondents.**

No payments or gifts will be given to respondents.

**10. Confidentiality provided to respondents.**

Questionnaires include a statement that individual reports are confidential. 44 U.S. Code Chapter 35; and Public Law 115-435, Title III (CIPSEA) provide for

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 the regulations and sign a statement of compliance.

Additionally, NASS employees and NASS contractors comply with the OMB implementation guidance document, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA)." CIPSEA supports NASS's 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.

**11. Questions of a sensitive nature.**

No questions of sensitive nature will be asked.

**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.**

The following table contains the adjusted, estimated annual burden hours for this group of surveys. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 172,137 hours is multiplied by \$37.47 per hour for a total annual cost to the public of \$ 6,449,973.39.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 31, 2020 for the previous May) to estimate an hourly wage for the burden cost. The May 2019 mean wage for bookkeepers was \$20.65. The mean wage for farm managers was \$38.63. The mean wage for farm supervisors was \$25.25. The mean wage of the three is \$28.18. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$37.47 per hour.

Average completion time per questionnaire is based on time required for other surveys of similar length. Calculation of burden hours is shown in the table below. Estimated response counts are based on an 80% target response rate and minutes per response shown are the average times for all questionnaires used for the commodity.

## Part A, Question 12 Original

## Projected Burden for Field Crops (OMB 0535-0002) for 2018 - 2020

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./ Non Resp	Burden Hours	
<b>Commodity Specific Surveys</b>											
<b>Alfalfa Seed</b>											
Alfalfa Seed Grower Inquiry <sup>2/</sup>	150	1	120	120	15	30	30	30	2	1	31
Grass Seed Forecast - OR <sup>2/</sup>	700	1	560	560	8	75	140	140	2	5	80
Alfalfa Seed Cleaners Inquiry <sup>2/</sup>	50	1	40	40	15	10	10	10	2	0	10
<b>Dry Beans, Dry Peas &amp; Lentils</b>											
Dry Bean Inquiry (end-of-season - Dec)	6,500	1	5,200	5,200	15	1,300	1,300	1,300	2	43	1,343
Dry Peas and Lentils (September)	600	1	480	480	10	80	120	120	2	4	84
Dry Bean Inquiry (NM) <sup>2/</sup>	20	1	16	16	15	4	4	4	2	0	4
<b>Mint</b>											
Mint Grower	500	1	400	400	10	67	100	100	2	3	70
<b>Oilseed Crops</b>											
Oilseeds, special	2,100	1	1,680	1,680	15	420	420	420	2	14	434
Sunflower, non-oil	10	3	8	24	10	4	2	6	2	0	4
<b>Popcorn</b>											
Popcorn Grower Inquiry <sup>2/</sup>	150	1	120	120	10	20	30	30	2	1	21
Popcorn Processor Inquiry <sup>2/</sup>	15	1	12	12	10	2	3	3	2	0	2
<b>Potatoes</b>											
Potato Grower Inquiry (Spring Potatoes)	0	1	0	0	5	0	0	0	2	0	0
Potato Grower Inquiry (Summer Potatoes)	0	1	0	0	5	0	0	0	2	0	0
Potato Grower Inquiry (Fall Potatoes)	1,100	1	880	880	5	73	220	220	2	7	80
Acreage & Disposition (Spring Potatoes)	0	1	0	0	20	0	0	0	2	0	0
Acreage & Disposition (Summer Potatoes)	0	1	0	0	20	0	0	0	2	0	0
Acreage & Disposition (Fall Potatoes)	1,400	1	1,120	1,120	20	373	280	280	2	9	382
Sweet Potato Price	0	2	0	0	15	0	0	0	2	0	0

**Part A, Question 12 Original (Page 2)**

Survey	Estimated Sample Size	Freq	Estimated Responses				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	Nonresp Count	Freq. x Count	Min./ Non Resp	Burden Hours	
<b>Sugar Crops</b>											
Sugarbeets	10	7	8	56	30	28	2	14	2	0	28
Sugar Cane Inquiry	20	11	16	176	15	44	4	44	2	1	45
<b>Tobacco</b>											
Tobacco Price Inquiry	2,200	2	1,760	3,520	10	587	440	880	2	29	616
<b>Variety Surveys</b>											
Wheat and Barley <sup>2/</sup>	35,000	1	28,000	28,000	10	4,667	7,000	7,000	2	233	4,900
Potato Variety Survey <sup>2/</sup>	90	1	72	72	20	24	18	18	2	1	25
<b>County Estimates</b>											
County Agricultural Production Survey (CAPS) Small Grains	85,000	1	68,000	68,000	15	17,000	17,000	17,000	2	567	17,567
County Agricultural Production Survey (CAPS) Row Crops	124,000	1	99,200	99,200	20	33,067	24,800	24,800	2	827	33,894
<b>Other Surveys</b>											
Crop Progress and Condition Report (Crop Weather)	4,000	40	3,200	128,000	10	21,333	800	32,000	2	1,067	22,400
Cash Rent Survey	290,000	1	232,000	232,000	10	38,667	58,000	58,000	2	1,933	40,600
Wildlife Damage Survey <sup>2/</sup>	20,000	1	16,000	16,000	25	6,667	4,000	4,000	2	133	6,800
<b>Publicity Materials (Cover Letters and EDR Instruction Sheet)</b>											
All Surveys <sup>1/</sup>	573,615		442,892	444,876	5	37,073	130,723	111,219	2	3,707	40,780
<b>Testing</b>											
Cognitive Testing <sup>3/</sup>	200	1	200	200	30	100	0	0	2	0	100
<b>Total</b>	<b>573,815</b>		<b>459,092</b>	<b>585,876</b>		<b>161,715</b>	<b>114,723</b>	<b>146,419</b>		<b>8,585</b>	<b>170,300</b>



**Part A, Question 12 Revised (Page 2)**

Survey	Estimated Sample Size	Freq	Estimated Responses				Nonresp Count
			Resp. Count	Freq x Count	Min./ Resp.	Burden Hours	
<b>Sugar Crops</b>							
Sugarbeets	10	7	8	56	30	28	2
Sugar Cane Inquiry	20	11	16	176	15	44	4
<b>Tobacco</b>							
Tobacco Price Inquiry	2,200	2	1,760	3,520	10	587	440
<b>Variety Surveys</b>							
Wheat Variety <sup>2/</sup>	35,000	1	28,000	28,000	10	4,667	7,000
Wheat and Barley Variety <sup>2/</sup> (Montana version)	5,300	1	4,240	4,240	20	1,413	1,060
Potato Variety Survey <sup>2/</sup>	90	1	72	72	20	24	18
<b>County Estimates</b>							
County Agricultural Production Survey (CAPS) Small Grains	85,000	1	68,000	68,000	15	17,000	17,000
County Agricultural Production Survey (CAPS) Row Crops	124,000	1	99,200	99,200	20	33,067	24,800
<b>Other Surveys</b>							
Crop Progress and Condition Report (Crop Weather)	4,000	40	3,200	128,000	10	21,333	800
Cash Rent Survey	290,000	1	232,000	232,000	10	38,667	58,000
Wildlife Damage Survey <sup>2/</sup>	20,000	1	16,000	16,000	25	6,667	4,000
<b>Publicity Materials (Cover Letters and EDR Instruction Sheet)</b>							
All Surveys <sup>1/</sup>	578,915		447,132	449,116	5	37,426	131,783
<b>Testing</b>							
Cognitive Testing <sup>3/</sup>	200	1	200	200	30	100	0
<b>Total</b>	<b>579,115</b>		<b>463,332</b>	<b>590,116</b>		<b>163,481</b>	<b>115,783</b>

<sup>1/</sup> The publicity materials are mailed out with each survey. However, since the Crop Progress Survey is the same sample each week, the p

<sup>2/</sup> These surveys are done under cooperative agreements.

<sup>3/</sup> A small amount of respondent burden was included in this approval for small cognitive testing. Any large scale tests will be submitted un

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

There is no cost burden to respondents.

**14. Annualized costs to federal government.**

The cost to reinstate the Montana Wheat and Barley Variety Survey is approximately \$45,000, most of which is staff costs. This includes the fully loaded wage rate (includes allowances for Social Security, insurance, etc.). The costs will be reimbursed by the Montana Wheat and Barley Commission. There will be no cost to the Federal government.

**15. Reasons for changes in burden.**

The revised total burden of 172,137 hours is up 1,837 hours from the current

inventory of 170,300 hours. The increase is due to reinstating the Montana Wheat and Barley Variety Survey.

**16. Tabulation, analysis, and publication plans.**

The only planned change to publications is an additional publication with the results of the Montana Wheat and Barley Variety Survey, planned for publication in late summer, 2021.

<https://www.nass.usda.gov/mt/>

**17. Request for approval of non-display of expiration date.**

There is no request for approval of non-display of the expiration date.

**18. Exceptions to certification statement.**

There are no exceptions to the certification statement.

March 2021