

SUPPORTING STATEMENT Part A

ARMS II and Vegetable Chemical Use Survey

Substantive Change

OMB No. 0535-0218

This substantive change is being submitted as a supplemental supporting statement to the Agricultural Resource Management and Chemical Use Surveys (ARMS).

A. JUSTIFICATION

1. Circumstances making collection of information necessary.

NASS is requesting a substantive change to the ARMS and Chemical Use Survey docket (0535-0218) to accommodate changes to several of the questionnaires.

NASS was approached by the Office of Pest Management Policy (OPMP), the Economic Research Service (ERS) and the Mississippi State University Extension Service (MSUES) through cooperative agreements to make changes to the ARMS II, the Vegetable Chemical Use surveys and the Mississippi Cropping Practices Surveys for Corn, Cotton, Rice, Soybeans, and/or Wheat for 2020.

The OPMP was created by the Agricultural Research, Extension, and Education Reform Act of 1998 in response to grower concerns about the implementation of the Food Quality Protection Act of 1996 (FQPA). By 1998 statute, and as reauthorized in the Agricultural Act of 2014 (P.L. 113-79), OPMP “shall be responsible for

- the development and coordination of Department policy on pest management and pesticides;
- the coordination of activities and services of the Department, including research, extension, and education activities, regarding the development, availability, and use of economically and environmentally sound pest management tools and practices;
- assisting other agencies of the Department in fulfilling their responsibilities related to pest management or pesticides under the Food Quality Protection Act of 1996, the Federal Food, Drug and Cosmetic Act and other applicable laws;
- perform other functions as required by law or by request of the Secretary;
- ensure coordination of interagency activities with EPA and FDA and other Federal and state agencies; and

- consult with agricultural producers that may be affected by pest management or pesticide-related activities or actions of the Department or other agencies.”

OPMP and ERS provide supplemental funding to NASS to offset a portion of the data collection costs for the ARMS and Chemical Use Surveys. In return, NASS adds supplemental questions to our questionnaires to address changes in research questions that occur each year regarding changes in the farming industry.

The additional questions that will be added to the questionnaires will address topics such as seed treatments, GPS enabled equipment, nutrient management, crop insurance, environmental regulations, organic production practices, etc. Complete listings of the questions added and deleted have been added as supplemental documents to this submission.

The Cropping Practices Surveys that are conducted for Mississippi State University are done under an external project agreement, where they provide complete funding for these surveys.

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

OPMP, ERS, and MSUES will be able to better address changes in the farming practices that have occurred since the original approval of this docket.

3. Use of improved information technology.

The ARMS II and Vegetable Chemical Use Surveys are done by phone and field enumeration. These changes to the questionnaires will not change anything as far use of technology.

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.

NASS incorporated additional screening questions and skip patterns to help minimize additional burden as much as possible.

6. Consequence if information collection were less frequent.

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

7. Special circumstances.

No special circumstances are associated with this information collection.

8. Federal register notice and consultation with outside persons.

Not applicable.

9. Payments or gifts to respondents.

No payments or gifts will be given to respondents.

10. Confidentiality provided to respondents.

Confidentiality will be provided to respondents in accordance with the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002. All confidentiality protections that are applied to all products released from these surveys will remain the same as originally approved.

11. Questions of a sensitive nature.

No questions of sensitive nature will be asked.

12. Hour burden and annualized costs to respondents.

The following table contains the estimated burden hours for the surveys included in this supplemental supporting statement. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. The adjusted overall cost to the public is estimated at \$3,933,627.84.

	Burden Hours	Estimated Hourly Rate \$	Total Cost \$
Original burden hours for total docket	106,334	\$ 36.84	\$ 3,917,344.56
Increase in burden hours for changes	442	\$ 36.84	\$ 16,283.28
Revised burden hours for total docket	106,776	\$ 36.84	\$ 3,933,627.84

NASS uses the Bureau of Labor Statistics' Occupational Employment Statistics (most recently published on March 29, 2019 for the previous May) to estimate an hourly wage for the burden cost. The May 2018 mean wage for bookkeepers was \$20.25. The mean wage for farm managers was \$38.43. The mean wage for

farm supervisors was \$24.42. The mean wage of the three is \$27.70. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$36.84 per hour.

Original Burden Tables

Respondent Burden for ARMS and Chemical Use Surveys for July 2018 - June 2021 1/												
Survey Year	Survey	Sample Size 5/	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.	Burden Hours	
Agricultural Resource Management Surveys (ARMS) Phases I, II, & III												
2018	Integrated Screening Survey (Phase I) (Mail)1/ 4/	-	1	-	-	15	-	-	-	2	-	-
	ARMS Screening Survey (Phase I) (Enumeration) 6/	-	1	-	-	15	-	-	-	2	-	-
	Production Practices Report (Phase II) 2/	7,500	1	6,000	6,000	35	3,500	1,500	1,500	2	50	3,550
	Production Practices & Costs Report (Phase II) 2/	5,000	1	4,000	4,000	65	4,333	1,000	1,000	2	33	4,366
	Costs & Returns Report Report (Phase III) (Mail) 3/	-	1	-	-	100	-	-	-	2	-	-
	Costs & Returns Report Report (Phase III) (Enumeration) 3/	-	1	-	-	100	-	-	-	2	-	-
2018 Total		12,500		10,000	10,000		7,833	2,500	2,500		83	7,916
2019	Integrated Screening Survey (Phase I) (Mail)1/ 4/	100,000	1	20,000	20,000	15	5,000	80,000	80,000	2	2,667	7,667
	ARMS Screening Survey (Phase I) (Enumeration) 6/	80,000	1	60,000	60,000	15	15,000	20,000	20,000	2	667	15,667
	Production Practices Report (Phase II) 2/	7,500	1	6,000	6,000	35	3,500	1,500	1,500	2	50	3,550
	Production Practices & Costs Report (Phase II) 2/	5,000	1	4,000	4,000	65	4,333	1,000	1,000	2	33	4,366
	Costs & Returns Report Report (Phase III) (Mail) 3/	35,000	1	7,000	7,000	100	11,667	28,000	28,000	2	933	12,600
	Costs & Returns Report Report (Phase III) (Enumeration) 3/	30,000	1	22,500	22,500	100	37,500	7,500	7,500	2	250	37,750
2019 Total		100,000		119,500	119,500		77,000	138,000	138,000		4,600	81,600
2020	ARMS Screening Survey (Phase I) (Mail) 1/	110,000	1	22,000	22,000	15	5,500	88,000	88,000	2	2,933	8,433
	ARMS Screening Survey (Phase I) (Enumeration) 6/	88,000	1	66,000	66,000	15	16,500	22,000	22,000	2	733	17,233
	Production Practices Report (Phase II) 2/	7,500	1	6,000	6,000	35	3,500	1,500	1,500	2	50	3,550
	Production Practices & Costs Report (Phase II) 2/	5,000	1	4,000	4,000	65	4,333	1,000	1,000	2	33	4,366
	Costs & Returns Report (Phase III) (Mail) 3/	35,000	1	8,750	8,750	100	14,583	26,250	26,250	2	875	15,458
	Costs & Returns Report (Phase III) (Enumeration) 3/	30,000	1	22,200	22,200	100	37,000	7,800	7,800	2	260	37,260
2020 Total		110,000		128,950	128,950		81,416	146,550	146,550		4,884	86,300
2021	Integrated Screening Survey (Phase I) (Mail)1/ 4/	100,000	1	20,000	20,000	15	5,000	80,000	80,000	2	2,667	7,667
	ARMS Screening Survey (Phase I) (Enumeration) 6/	80,000	1	60,000	60,000	15	15,000	20,000	20,000	2	667	15,667
	Production Practices Report (Phase II) 2/	-	1	-	-	35	-	-	-	2	-	-
	Production Practices & Costs Report (Phase II) 2/	-	1	-	-	65	-	-	-	2	-	-
	Costs & Returns Report (Phase III) (Mail) 3/	35,000	1	7,000	7,000	100	11,667	28,000	28,000	2	933	12,600
	Costs & Returns Report (Phase III) (Enumeration) 3/	30,000	1	22,500	22,500	100	37,500	7,500	7,500	2	250	37,750
2021 Total		100,000		109,500	109,500		69,167	135,500	135,500		4,517	73,684
Cognitive Testing												
3 years	Testing approximately 50 ARMS and/or Chemical Use questionnaires per year	50	1	50	50	90	75	-	-		-	75

1/ ARMS and Chemical Use surveys are conducted on a cyclical basis that does not follow a calendar year, but instead follows the crop production year. The ARMS phase 1 is conducted in the Spring and early Summer for that crop year. The ARMS II and Chemical Use Surveys are conducted in the Autumn for the current production cycle. The ARMS III is conducted the following year for the previous years expenses and income for both whole farm and commodity specific data.

2/ Phase II surveys are all conducted as face to face interviews. Field enumerators can copy much of the chemical use data from the farm operator's record books. The remainder of the data can be obtained directly from the farm operator. The chemical data is related to a specific field selected of each farm sampled for this survey.

3/ All Phase III questionnaires will be attempted by mail with phone and field enumeration for non-respondents. In 2017 respondents have the option of completing the ARMS III questionnaire and not having to complete the Census of Agriculture. The ARMS III questionnaire contains the same essential questions as the Census.

4/ In 2016 and 2018 the ARMS Phase I Screener will also be used to pre-screen for the Vegetable Chemical Use Survey.

5/ The ARMS Phases II & III are both subsampled from the Phase I Screening Survey.

6/ Phase I is available by internet, mail, phone and face to face enumeration. The questionnaires are mailed out with pre-survey letter and internet instructions. Historically we have received approximately a 20% response rate by mail and EDR combined. This is followed by phone and personal enumeration for non-respondents.

0535-0218 - Projected Respondent Burden for EPAs in 2018 - 2020														
(External Project Agreement "EPA" are surveys that NASS conducts under cooperative agreements with State agencies.)														
State	Commodity	Sector	Survey Name	Sample Size	Waves of Data Collection	Resp. Count	Waves X Count	Min. / Resp	Burden Hours	Non-Resp Count	Waves X Count	Min / Non Resp.	Burden Hours	Total Burden Hours
Mississippi	All (crops)	Growers	Screenener	1,350	1	473	473	15	118	878	878	2	29	147
Mississippi	Wheat	Growers	Cropping Practices - Wheat	70	1	56	56	90	84	14	14	2	0	84
Mississippi	Corn	Growers	Cropping Practices - Corn	115	1	92	92	90	138	23	23	2	1	139
Mississippi	Rice	Growers	Cropping Practices - Rice	40	1	32	32	90	48	8	8	2	0	48
Mississippi	Cotton	Growers	Cropping Practices - Cotton	90	1	72	72	90	108	18	18	2	1	109
Mississippi	Soybeans	Growers	Cropping Practices - Soybeans	115	1	92	92	90	138	23	23	2	1	139
Minnesota	Corn, Soybeans, Wheat, Hay	Growers	Pesticide & Fertilizer Use in Minnesota	8,400	1	6,720	6,720	30	3,360	1,680	1,680	2	56	3,416
Maryland	All	Pesticide Applicators	Maryland Pesticide Usage Survey (Mail)	6,800	1	2,040	2,040	45	1,530	4,760	4,760	2	159	1,689
			Maryland Pesticide Usage Survey (Phone Follow-Up)	4,760	1	3,332	3,332	45	2,499	1,428	1,428	2	48	2,547
Illinois	Cultural Practices	Crops	Nutrient Loss Reduction Strategy (1st Mailing)	1,900	1	570	570	25	238	1,330	1,330	2	44	282
			Nutrient Loss Reduction Strategy, (2nd Mailing)	1,330	1	200	200	25	83	1,131	1,131	2	38	121
			Nutrient Loss Reduction Strategy (Phone Follow-Up)	1,131	1	678	678	25	283	452	452	2	15	298

Publicity Materials ¹⁴														
Cover Letter and/or EDR Instruction Sheet				18,880	1	14,356	14,356	5	1,196	4,524	4,524	2	151	1,347
Cognitive Testing														
Questionnaire Testing				30	1	30	30	120	60	0	0	2	0	60
TOTALS				18,910		14,386	14,386		9,883	4,524	11,744		543	10,426

^{1/} The publicity materials for these reimbursable surveys is not included in the publicity materials on the third page. That number is for the Federally Funded surveys only.

Respondent Burden for ARMS and Chemical Use Surveys for July 2018 - June 2021 1/												
Survey Year	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.	Burden Hours	
Contractor Expense Survey 3/												
2019	Contractor Expense Survey	100	1	80	80	45	60	20	20	2	1	61
2020	Contractor Expense Survey	100	1	80	80	45	60	20	20	2	1	61
2021	Contractor Expense Survey	100	1	80	80	45	60	20	20	2	1	61
Total		300		240	240		180	60	60		3	183
Chemical Use Surveys - NASS Program Only												
2018	Vegetable Chem Use	4,200	1	3,360	3,360	45	2,520	840	840	2	28	2,548
2019	Fruit Chem Use	6,700	1	5,360	5,360	45	4,020	1,340	1,340	2	45	4,065
2020	Vegetable Chem Use	4,200	1	3,360	3,360	45	2,520	840	840	2	28	2,548
Total		15,100		12,080	12,080		9,060	3,020	3,020		101	9,161
Microbial Food Saftey Practices -- Packer Survey												
Discontinued	Microbial Food Safety Practices -- Packer Survey	-	1	-	-	30	-	-	-	2	-	-
Total		-		-	-		-	-	-		-	-
Publicity Materials for ALL surveys 2/												
2018	All materials for all versions 4/	16,700	1	13,360	13,360	5	1,113	3,340	3,340	2	111	1,224
2019	All materials for all versions	123,500	1	98,800	98,800	5	8,233	24,700	24,700	2	823	9,056
2020	All materials for all versions	115,800	1	92,640	92,640	5	7,720	23,160	23,160	2	772	8,492
2021	All materials for all versions	100,250	1	80,200	80,200	5	6,683	20,050	20,050	2	668	7,351
Total		356,250		285,000	285,000		23,749	71,250	71,250		2,374	26,123
Quality Control Survey (Telephone Only) - Recontact operators to verify quality of NASDA enumerators. 4/												
2019	Quality Control Worksheet (phone only)	1,500	1	1,500	1,500	5	125	-	-		-	125
2020	Quality Control Worksheet (phone only)	1,500	1	1,500	1,500	5	125	-	-		-	125
2021	Quality Control Worksheet (phone only)	1,500	1	1,500	1,500	5	125	-	-		-	125
Total		4,500		4,500	4,500		375				-	375
Annual Totals 2/												
2018	Annual Totals 4/	35,660	1	27,796	27,796		21,349	7,864	15,924		765	22,114
2019	Annual Totals	125,760	1	100,618	140,876		99,396	25,142	150,604		6,012	105,408
2020	Annual Totals	133,260	1	106,618	148,326		101,799	26,642	159,154		6,228	108,027
2021	Annual Totals	100,150	1	80,120	111,130		76,110	20,030	135,520		5,186	81,296
Annual Averages		131,610		105,051	142,710		99,551	26,559	153,734		6,064	105,615
	Average Burden per Respondent per Year	0.80248461			1.35848255		0.6975755		5.78840		0.03944	

1/ ARMS and Chemical Use surveys are conducted on a cyclical basis that does not follow a calendar year, but instead follows the crop production year. The ARMS phase 1 is conducted in the Spring and early Summer for that crop year. The ARMS II and Chemical Use Surveys are conducted in the Autumn for the current production cycle. The ARMS III is conducted the following year for the previous years expenses and income for both whole farm and commodity specific data.

2/ For annual totals the sample size does not include the counts from the publicity materials, since it is the same operators. However, the burden counts do include the burden associated with the publicity materials. The surveys that are attempted by mail will have the publicity materials included with the initial mailing. No publicity materials are sent out with the Contractor Expense Surveys.

3/ Contractor Expense Survey is conducted to collect and summarize the amount of farm input provided by contractors. This data is summarized and used to complete surveys when the farm operator cannot provide the contractor inputs for their farming operation.

4/ Publicity materials are not sent out to sampled operations that were contacted for a quality control survey.

Revisions for 2020 – sheet 1

Respondent Burden for ARMS and Chemical Use Surveys for July 2018 - June 2021 1/												
Survey Year	Survey	Sample Size 5/	Waves of Data Collection	Responses				Non-response				Total Burden Hours
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Agricultural Resource Management Surveys (ARMS) Phases I, II, & III												
2018	Integrated Screening Survey (Phase I) (Mail)1/ 4/	-	1	-	-	15	-	-	-	2	-	-
	ARMS Screening Survey (Phase I) (Enumeration) 6/	-	1	-	-	15	-	-	-	2	-	-
	Production Practices Report (Phase II) 2/	7,500	1	6,000	6,000	35	3,500	1,500	1,500	2	50	3,550
	Production Practices & Costs Report (Phase II) 2/	5,000	1	4,000	4,000	65	4,333	1,000	1,000	2	33	4,366
	Costs & Returns Report Report (Phase III) (Mail) 3/	-	1	-	-	100	-	-	-	2	-	-
	Costs & Returns Report Report (Phase III) (Enumeration) 3/	-	1	-	-	100	-	-	-	2	-	-
	2018 Total	12,500		10,000	10,000		7,833	2,500	2,500		83	7,916
2019	Integrated Screening Survey (Phase I) (Mail)1/ 4/	100,000	1	20,000	20,000	15	5,000	80,000	80,000	2	2,667	7,667
	ARMS Screening Survey (Phase I) (Enumeration) 6/	80,000	1	60,000	60,000	15	15,000	20,000	20,000	2	667	15,667
	Production Practices Report (Phase II) 2/	3,600	1	2,880	2,880	50	2,400	720	720	2	24	2,424
	Production Practices & Costs Report (Phase II) 2/	5,300	1	4,240	4,240	65	4,593	1,060	1,060	2	35	4,628
	Costs & Returns Report Report (Phase III) (Mail) 3/	35,000	1	7,000	7,000	100	11,667	28,000	28,000	2	933	12,600
	Costs & Returns Report Report (Phase III) (Enumeration) 3/	30,000	1	22,500	22,500	100	37,500	7,500	7,500	2	250	37,750
	2019 Total	100,000		116,620	116,620		76,160	137,280	137,280		4,576	80,736
2020	ARMS Screening Survey (Phase I) (Mail) 1/	110,000	1	22,000	22,000	15	5,500	88,000	88,000	2	2,933	8,433
	ARMS Screening Survey (Phase I) (Enumeration) 6/	88,000	1	66,000	66,000	15	16,500	22,000	22,000	2	733	17,233
	Production Practices Report (Phase II) 2/	7,500	1	6,000	6,000	50	5,000	1,500	1,500	2	50	5,050
	Production Practices & Costs Report (Phase II) 2/	5,000	1	4,000	4,000	75	5,000	1,000	1,000	2	33	5,033
	Costs & Returns Report (Phase III) (Mail) 3/	35,000	1	8,750	8,750	100	14,583	26,250	26,250	2	875	15,458
	Costs & Returns Report (Phase III) (Enumeration) 3/	30,000	1	22,200	22,200	100	37,000	7,800	7,800	2	260	37,260
	2020 Total	110,000		128,950	128,950		83,583	146,550	146,550		4,884	88,467
2021	Integrated Screening Survey (Phase I) (Mail)1/ 4/	100,000	1	20,000	20,000	15	5,000	80,000	80,000	2	2,667	7,667
	ARMS Screening Survey (Phase I) (Enumeration) 6/	80,000	1	60,000	60,000	15	15,000	20,000	20,000	2	667	15,667
	Production Practices Report (Phase II) 2/	-	1	-	-	35	-	-	-	2	-	-
	Production Practices & Costs Report (Phase II) 2/	-	1	-	-	65	-	-	-	2	-	-
	Costs & Returns Report (Phase III) (Mail) 3/	35,000	1	7,000	7,000	100	11,667	28,000	28,000	2	933	12,600
	Costs & Returns Report (Phase III) (Enumeration) 3/	30,000	1	22,500	22,500	100	37,500	7,500	7,500	2	250	37,750
	2021 Total	100,000		109,500	109,500		69,167	135,500	135,500		4,517	73,684
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4/ In 2016 and 2018 the ARMS Phase I Screener will also be used to pre-screen for the Vegetable Chemical Use Survey.

5/ The ARMS Phases II & III are both subsampled from the Phase I Screening Survey.

6/ Phase I is available by internet, mail, phone and face to face enumeration. The questionnaires are mailed out with pre-survey letter and internet instructions. Historically we have received approximately a 20% response rate by mail and EDR combined. This is followed by phone and personal enumeration for non-respondents.

Revisions for 2020 - sheet 3

2021	Annual Totals	100,150	1	80,120	111,130		76,110	20,030	135,520		5,186	81,296
Annual Averages		131,610		105,051	141,750		100,720	26,559	153,494		6,056	106,776
	Average Burden per Respondent per Year	0.81130613			1.34934411		0.6975755		5.78840		0.03945	

1/ ARMS and Chemical Use surveys are conducted on a cyclice basis that does not follow a calendar year, but instead follows the crop production year. The ARMS phase 1 is conducted in the Spring and early Summer for that crop year. The ARMS II and Chemical Use Surveys are conducted in the Autumn for the current production cycle. The ARMS III is conducted the following year for the previous years expenses and income for both whole farm and commodity specific data.

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3/ Contractor Expense Survey is conducted to collect and summarize the amount of farm input provided by contractors. This data is summarized and used to complete surveys when the farm operator cannot provide the contractor inputs for their farming operation.

4/ Publicity materials are not sent out to sampled operations that were contacted for a quality control survey.

Annual Totals Originally												
2018	Annual Totals 4/	35,660	1	27,796	27,796		21,349	7,864	15,924		765	22,114
2019	Annual Totals	125,760	1	100,618	140,876		99,396	25,142	150,604		6,012	105,408
2020	Annual Totals	133,260	1	106,618	148,326		101,799	26,642	159,154		6,228	108,027
2021	Annual Totals	100,150	1	80,120	111,130		76,110	20,030	135,520		5,186	81,296
Annual Averages		131,610		105,051	142,710		99,551	26,559	153,734		6,064	105,615
Average Burden per Respondent per Year		0.80248461			1.35848255		0.6975755		5.78840		0.03944	
Difference in annual average rates												
		0		0	(960)		1,169	-	(240)		(8)	1,161

04/01/20	Responses			Non-response			Total Burden Hours
	Resp. Count	Waves X Count	Burden Hours	Nonresp Count	Waves X Count	Burden Hours	
Revised 3 Year Average	105,051	141,750	100,720	26,559	153,494	6,056	106,776
Previous 3 Year Average	105,051	141,750	100,278	26,559	153,494	6,056	106,334
Difference	-	-	442	-	-	-	442

13. Total annual cost burden to respondents.

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

14. Annualized costs to federal government.

There are no changes to the total annual cost of \$18 million for the Agricultural Resource Management Surveys and the Chemical Use programs as a result of these changes.

15. Reasons for changes in burden.

Based on the ARMS II and the Fruit Chemical Use surveys conducted in 2019, in which the field enumerators were asked to record beginning and ending times for personal interviews the changes in average burden per questionnaire is reported in the table below.

For the Cropping Practices Surveys conducted for the Mississippi State University there are no overall changes in burden resulting from changes to those questionnaires.

Adjustments to Total Burden for 2020 Chemical Use Surveys						
	Approved Sample Size	Revised Sample Size	Difference	Approved Burden Minutes per Questionnaire	Revised Burden Minutes per Questionnaire	Difference
Production Practices & Cost Report (ARMS II)	5,000	5,000	-	65	75	10
Commodities (Corn and Rice)						
Production Practices Report (ARMS II)	7,500	7,500	-	35	50	15
Commodities (Soybeans)						
Vegetable Chemical Use Survey	4,200	4,200	-	45	60	15

16. Tabulation, analysis, and publication plans.

The changes to the questionnaires will be incorporated in the publications that are listed in the original approval docket.

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

No request is being made for approval of non-display of the expiration date.

18. Exceptions to certification statement.

No exceptions to the certification statement are requested.

April 2020