

2024 Supporting Statement – Part A
REQUEST FOR GENERIC CLEARANCE OF MULTIPLE CROP
AND PESTICIDE USE INFORMATION COLLECTIONS
from the
OFFICE OF PEST MANAGEMENT POLICY
OMB Control No. 0503-0026

SECTION 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 Office of Pest Management Policy (OPMP) of the United States Department of Agriculture (USDA) requests approval from the Office of Management and Budget (OMB) for generic clearance that will allow OPMP to collect information from agricultural stakeholders. The primary purpose of this information will be to support OPMP's understanding of agricultural practices pertaining to pest management. OPMP is undertaking this effort to satisfy legislative requirements outlined in Title X, Section 10109 of the 2018 Farm Bill, which mandates that The Secretary of Agriculture, acting through the Office of the Chief Economist's Director of OPMP, collect this information.

Pest management information is critical to supporting a key responsibility of OPMP, i.e., to "consult with agricultural producers that may be affected by pest management or pesticide-related activities or actions of the Department or other agencies," as outlined in the Agricultural Research, Extension, and Education Reform Act of 1998. This request for approval will improve OPMP's ability to better understand the utilization of pest management tools by agricultural producers via input from pest management advisors—including extension experts, crop consultants, and other agricultural stakeholder organizations, who in addition to being advisors are often agricultural producers themselves. Data collected are intended to capture agricultural practices and needs to support federal activities that pertain to pest management, which are typically time-sensitive and necessitate the need for rapid data collection.

In most cases, the turnaround time for these information collections will be a function of 60-day public comment periods associated with pesticide licensing actions, making it essential for OPMP to promptly administer requests and collect responses. Various factors drive what types of questions OPMP may ask, and although the number of questions asked is fairly limited, the scope of potential questions can widely differ depending on the active ingredient or practice, and use site(s) in question, as well as application methods, specific target pest problems, etc. Examples of questions include inquiries regarding pesticide usage, the availability and comparative utility of alternative pest management tactics for target pests, and resistance management concerns.

This effort does not intend to duplicate information collection activities administered by USDA's National Agricultural Statistics Service (NASS) that pertain to pest management. When needed data are current and available through NASS collection efforts, it is OPMP's policy to utilize and recognize such information as Best Available Data.

OPMP envisions that these data would primarily be collected using online questionnaires. In some cases, e-mail, phone-based interviews, and/or focus groups may be necessary. Following standard OMB requirements, OPMP will submit a change request to OMB individually for each project it undertakes under this generic clearance. Respondent questions will be selected from the question bank presented in Appendix A, and OMB will be provided with a copy of any questionnaire(s) and all other materials describing the project.

These data will be collected under the authority of 7 U.S.C. 2204(a). Individually identifiable data collected under this authority are governed by section 1770 of the Food Security Act of 1985, 7 U.S.C. 2276, which requires USDA to afford strict confidentiality to non-aggregated data provided by respondents. This Notice is submitted in accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-113) and Office of Management and Budget regulations at 5 CFR part 1320 (60 FR 44978, August 29, 1995).

OPMP will report to OMB on an annual basis a summary of the projects conducted under this clearance.

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.

OPMP is legislatively mandated by the Agricultural Research, Extension, and Education Reform Act of 1998 to consult with agriculturalists that may be affected by pest management or pesticide-related activities or actions of the Department or other agencies. The primary purpose for this information request is to collect information to support OPMP's ability to carry out this mandate. The Environmental Protection Agency (EPA)—as the federal agency with jurisdiction over federal pesticide registration and registration review decisions per the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)—is the main federal entity whose actions can affect agricultural pest management and pest-related activities. For this reason, EPA is the primary agency with which OPMP acts as an intermediary in assembling information on how pest management activities or actions affect agricultural producers.

FIFRA requires that pesticide risks and benefits be balanced, which in certain cases can be complicated by absent, outdated, or unavailable information. Further, in some cases regional nuances exist, such as niche pests or variations in pest species, differing regional production practices, and/or variations in pest management practices. Such differences—despite being critical information for understanding pest management decisions and benefits—are often not distinctly captured by existing pest management information

collections efforts, which tend to focus on annual pesticide usage. Further, these pest management information sources often do not survey small acreage specialty crops. These factors create a need for a pesticide usage information collection effort that not only can better understand specific pest management decisions, but also provides a platform for representing all agricultural producers, regardless of industry size.

These information collections may extend beyond the scope of FIFRA, as USDA and other agencies in some cases participate in pest management or pesticide-related activities. Historically, however, such occurrences have been rare and there is no indication that there will be an increase in these instances during the three-year duration of this information collection request. Information collection may also cover the feasibility of mitigations aimed at protecting endangered species under the Endangered Species Act (ESA).

Procedures for Information Collection

OPMP has longstanding working relationships with agricultural experts, such as university Extension specialists and representatives from crop consultant associations. This cohort of experts makes up the target respondents for this information collection, as both of these groups provide technical advice to agricultural producers. Many of these experts are also agricultural producers, and often satisfy certification experience requirements with their ongoing farm production activities. Further, OPMP has the means to contact the entire population of university agricultural specialists (including extension experts), American Society of Agronomy (ASA) Certified Crop Advisors (CCAs), and crop consultants associated with the National Alliance of Independent Crop Consultants (NAICC), allowing for a census-like study of crop consultants and advisors. Given that a primary goal of this information collection is to ensure that niche use and usage needs for pest management tools are accounted for, ideally responses across the entire population of potential respondents can be captured.

To reduce burden to the greatest extent possible, OPMP will attempt to contact sub-census populations of Extension specialists and crop consultants for questionnaires using their specializations. This can also potentially be achieved by targeting specific geographies. For example, in the case of extension specialists, if an information collection need is specific to herbicide usage on a particular crop, then only specialists that are located in states in which that crop is grown will be contacted. Additionally, in many cases the states that crop consultants operate in and the crops that they consult for is known, again allowing for sub-census level outreach. Throughout the life of this data collection, OPMP will continuously develop and update research panels to more accurately target appropriate sub-census populations. To this end, OPMP is proposing to contact members of trade organizations or other agricultural stakeholder organizations to target specific niche groups that are most likely to have knowledge of a specific agricultural production process in this update of the ICR. While it is expected that contacting members of a specific agricultural stakeholder organization will be rare, there have been at least two instances when OPMP needed to collect information about pest management in an agricultural production process for which knowledge about the process was not covered by crop consultants or university extension

specialists. The burden tables have been updated to include the potential for this rare niche collection.

Allowable Information Collection Methods

The list below includes allowable collection methods under this generic clearance. Depending on the needs of each specific information collection and the population(s) being surveyed, it may be necessary to combine one or more of the methods described below. It is assumed that most collections will be implemented via web-based surveys, although other methods, such as telephone surveys, interviews, and/or focus groups may be needed under certain circumstances.

Web-based and social media-based surveys:

Web-based surveys and surveys administered via social media are generally more convenient to the respondent, as he or she can complete the survey when they choose. OPMP collaborated with USDA's Office of the Chief Information Officer (OCIO) in identifying vendors that met USDA's software and security criteria to ensure the protection of respondents Personally Identifiable Information (PII). OPMP received approval to use Qualtrics to administer questionnaires and has used this platform for all questionnaires that have been distributed under this ICR.

Links to the surveys may be posted on websites, including social media websites, or may be sent to respondents via e-mail. All questionnaires designed through the Qualtrics platform are accessible via a smartphone application. In some cases, due to constraints created by EPA's 60-day comment periods, the second and final follow-up requests using Dillman's "Tailored Design Method" may have to occur prior to the typical four- and eight-week follow-up durations.

Allowable Information Collection Topics and Questions

USDA will limit the topics and questions presented to respondents to those supplied in the question bank (see Appendix A). The questions included in the question bank are primarily a function of questions that were asked in the past by OPMP to nine or fewer respondents, in accordance with the Paperwork Reduction Act (PRA), prior to the first approval of this ICR. Every collection will include basic demographic questions, which are also indicated in the question bank in Appendix A. Beyond the basic demographic questions, approximately 10-15 questions will be asked in each collection. The response options for these questions will vary depending on the collection to account for variables such as differing cropping systems, geographic regions, and pesticide types.

The questions included in the question bank can be broadly categorized. Table A-1 provides an overview of these categories. These are updated from the last ICR to reflect the edits and consolidation to the question bank (See Appendix A). In cases where questions arise that are outside the scope of the question bank, OPMP will limit outreach to nine or fewer respondents and will keep record of questions that need to be added to the question bank for future information collection renewals.

Table A-1. Overview of Question Categories

Category	Number of Questions	Percentage of Total
Alternative Pesticides and/or Pest Management Measures	27	9%
Application Method	31	10%
Application Rate	31	10%
Application Timing	3	1%
Biology	3	1%
Economic Considerations	11	4%
End Products	1	<1%
Geographic Considerations	17	6%
Local Regulations	1	<1%
Miscellaneous	5	2%
Niche Uses	2	1%
Number of Applications	22	7%
Pesticide Benefits	33	11%
Pesticide Formulation	9	3%
Pesticide Use & Usage	34	11%
Production Practices	21	7%
Request for Expert Contacts	3	1%
Tank Mixing	3	1%
Target Pests	39	13%
Worker Considerations	7	2%
Total	303	

A great deal of diversity is expected regarding the types of crops that will be researched. Reflecting on historical OPMP information requests to nine or fewer respondents from 2016 to 2018, more than 85 crops were covered (see Table A-2). Note that nearly three out of four information collections were for specialty crops and/or minor use crops (less than 300,000 acres grown annually). Information collections to nine or fewer respondents that are not specific to a crop are not fully reflected in Table A-2, such as information requests for non-bearing fruit, organic production, and small seed vegetable crops.

Since the approval of this ICR, OPMP has continued to reach out to groups of nine or fewer respondents for information where possible and has reserved the ICR for issues requiring a larger collection.

Table A-2. Types of Crops Included in EPA Requests to OPMP

Crop	Number of Requests	Percentage of Total Requests
Alfalfa	1	1%
Almonds	1	1%
Apples	3	2%
Apricots	1	1%
Asparagus	2	1%

Crop	Number of Requests	Percentage of Total Requests
Avocados	1	1%
Bananas	1	1%
Beans, Green	2	1%
Beets	1	1%
BLM Lands (rangeland)	1	1%
Blueberries	2	1%
Broccoli	1	1%
Cabbage	2	1%
Caneberry: Blackberry	2	1%
Caneberry: Raspberry	2	1%
Canola	1	1%
Cantaloupes	1	1%
Carrots	2	1%
Cattle	2	1%
Cauliflower	1	1%
Celeriac	1	1%
Celery	1	1%
Cherries	2	1%
Christmas trees	1	1%
Cilantro	1	1%
Citrus	3	2%
Coriander	1	1%
Corn, field	5	3%
Corn, sweet	5	3%
Cotton	5	3%
Cranberries	2	1%
Cucumbers	2	1%
Dill	1	1%
Dry beans/peas	2	1%
Eggplant	1	1%
Forestry	4	3%
Ginger root	1	1%
Grapefruit	4	3%
Grapes	2	1%
Greenhouse ¹	5	3%
Hay	1	1%
Herbs	1	1%
Horseradish	1	1%
Hybrid poplar	1	1%
Lemons	4	3%
Lettuce	2	1%
Mint	1	1%
Mustard	1	1%
Nectarines	1	1%
Olives	1	1%
Onions	1	1%

Crop	Number of Requests	Percentage of Total Requests
Oranges	4	3%
Organic uses	1	1%
Parsley	2	1%
Parsnip	1	1%
Peaches	2	1%
Peanuts	1	1%
Pears	2	1%
Pecans	1	1%
Peppers	1	1%
Pineapple	1	1%
Pistachios	1	1%
Plantains	1	1%
Potatoes	3	2%
Poultry houses	3	2%
Prunes	1	1%
Pumpkins	1	1%
Radish	1	1%
Rice	1	1%
Sod	2	1%
Sorghum	3	2%
Soybeans	2	1%
Spinach	1	1%
Squash	1	1%
Strawberries	1	1%
Sugarcane	1	1%
Sugar beets	4	3%
Sunflowers	1	1%
Sweet potatoes	2	1%
Swine facilities	1	1%
Tangelos	4	3%
Tangerines	4	3%
Tobacco	1	1%
Tomatoes	2	1%
Tree nuts	1	1%
Walnuts	1	1%
Watercress	1	1%
Watermelons	1	1%
Wheat	2	1%
Total	158	

1. Includes greenhouse, nursery, & ornamental production

Source: Internal OPMP calculations

A need may arise to collect pest management information for other purposes, such as to assist OPMP in better understanding the presence of resistant pests. Questions will be limited to those presented in the question bank and a change request, including a copy of

the questionnaire and all other materials describing the project, will be submitted to OMB for each individual project undertaken. These surveys will often be the results of needing information to respond to a proposed policy with a 60-day comment window so OPMP will need fast turnaround to be able to provide the information in time.

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.**

OPMP has employed the use of a web-based survey with smartphone capabilities to reduce the burden on respondents who agree to participate. OPMP may also explore the use of technologies (e.g., Microsoft Teams or Zoom) to conduct focus groups and other appropriate uses of technology, as yet unknown, to reduce burden on respondents. Qualtrics allows the specification of acceptable data formats for open-ended questions (e.g., text, number, date, etc.) which can avoid errors in the data that result in burdening respondents without the gathering of useful information.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

These information collection requests are being undertaken to answer questions that have not yet been addressed or answered by other information collection efforts or that are not current enough to satisfy an information need. Other major sources of information for pest management practices and pesticide use and usage data are USDA's National Agricultural Statistics Service (NASS), the California Department of Agriculture's Pesticide Usage Report, and third-party proprietary data providers. In some cases, information is available through information collection efforts administered by agriculturally affiliated associations.

To ensure duplicate questions are not being asked of growers and other agriculturalists, prior to any information collection OPMP will explore NASS datasets using NASS' online QuickStats tool (e.g., Chemical Use Surveys and Agricultural Resource Management Surveys, etc.). Special tabulations and/or NASS data lab exploration will be used for pest management questions that are not captured in QuickStats. Data from proprietary companies for which USDA holds subscriptions will be checked prior to an information collection. If replicate information is found via any of these sources that is considered current and valid, OPMP will not ask duplicate questions without providing justification to the Office of Management and Budget's (OMB) Office of Information and Regulatory Affairs (OIRA).

Survey instruments and final reports will be made publicly available on OPMP's website and shared with EPA per Title X, Section 10109 of the 2018 Farm Bill. In addition, the collected data will also be archived using databases that are in compliance with USDA's

data security requirements to ensure the confidentiality of these data. The primary purpose of publicly posting survey instruments and final reports as well as internally archiving data is to reduce the duplication of efforts and public burden. Further, to reduce redundancy and increase transparency, OPMP plans to not only notify relevant agricultural groups prior to information collection requests occurring for their crops but will also produce a notification of final reports being made publicly available.

5. 1If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

OPMP estimates that approximately 75% of the 15,583 respondents being surveyed, or approximately 11,688 respondents, could be classified as small businesses or small entities. OPMP will minimize the burden on these respondents by using the smallest possible number of questions to collect the information that is necessary. Beyond basic demographic questions, approximately 10-15 questions will be included in each collection effort. Electronic collection methods will be utilized to reduce respondent burden.

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 primary consequence from not conducting this information collection is that it would deny the agricultural industry the ability to afford important and insightful input towards a better understanding of pest management practices that may be unknown by the federal government; this consequence is especially valid for underrepresented specialty crops. The information collection effort at hand is designed to gauge the existence of exceptions to blanket assumptions about benefits and pesticide usage. As described previously, in the status quo OPMP collects this information but is limited to nine or fewer responses to be in compliance with the Paperwork Reduction Act (PRA); this dramatically limits the usefulness and robustness of the information that OPMP is able to collect. Given this restriction, often entire regions cannot be represented even with a single response, which is of high consequence to understanding potential impacts from weather conditions, resistance development of pests to pesticides, agronomic practices, and pest pressures—which amongst many other variables, can greatly vary regionally. Further, in some cases OPMP has not been able to seek information across all potentially affected agricultural systems, which can lead to holes in the office’s understanding of pest management usage and benefits. Expanding the scope of OPMP’s ability to reach out to more than nine respondents and addressing all potentially affected agricultural systems will greatly increase both efficiencies and the quality of information collected.

7. 1Explain any special circumstances that would cause an information collection to be conducted in a manner requiring respondents to report information to the agency more often than quarterly.

This is a voluntary survey. Consequently, there are no circumstances that would require respondents to report information to OPMP.

- 8. Provide 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.**

The notice of this request appeared in Volume 89, Number 23, of the Federal Register, on pages 7354 to 7356, on Friday, February 2, 2024. The comment period closed on April 2, 2024. No comments were received.

Notably, on the first publication of this ICR, OPMP sought feedback from three stakeholders external to USDA: the United States Environmental Protection Agency, the American Society of Agronomy Certified Crop Advisors, and the National Alliance of Independent Crop Consultants. Each of these stakeholders was broadly supportive of the data collection effort for the initial ICR and continues to be supportive. The three contacts listed below reviewed the ICR materials for this renewal and have indicated their continued support.

Name	Title
TJ Wyatt	Chief, Economic Analysis Branch, Office of Pesticide Programs, EPA Wyatt.Tj@epa.gov
Allison Jones	Executive Vice President, National Alliance of Independent Crop Consultants allisonjones@naicc.org 423-884-3199
Luther Smith	Director Professional Development and Business Relations, American Society of Agronomy Certified Crop Advisors www.certifiedcropadviser.org 608-273-8085

- 9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.**

Incentives, remuneration, and gifts are generally deemed inappropriate as part of plans for information collections conducted within the scope of this programmatic clearance.

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

Respondents in the survey improvement projects will be advised that their participation is voluntary. OPMP will work to maintain the confidentiality of the information so that no organization or individual, or their personal data are released.

All questionnaires include a statement that individual reports are kept confidential. U.S. Code Title 18, Section 1905 and U.S. Code Title 7, Section 2276 provide for the confidentiality of reported information. All employees OPMP employees or other federal

entities that are permitted to view collected data must read the regulations and sign a statement of compliance (Privacy Impact Statements).

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No personally sensitive information will be collected. Information about pest management practices in some cases can be sensitive business information. For this reason, instruments used for information collection will clearly outline protections being put in place to guard an individual's identity and responses. Public-facing documents will only present summarized results for larger geographic regions (typically the national or state level) to avoid disclosure of an individual's practices. The instrument will also clearly outline protections of individually identifiable data collected governed by section 1770 of the Food Security Act of 1985, 7 U.S.C. 2276, which requires USDA to afford strict confidentiality to non-aggregated data provided by respondents. Outlined in the instrument will also be data security measures being taken and OPMP's compliance with USDA's data security and confidentiality policies.

This survey is voluntary; the instrument will make it clear to potential respondents that participation is at their discretion, but their confidentiality will be safe-guarded.

- 12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

These information collections will be conducted via surveys hosted on either website or smartphone platforms. As outlined in Table B-1, the total potential universe is 15,583 respondents. This is considered a highly conservative, all-encompassing upper-bound estimate, as it assumes that every potential respondent will receive a request to participate. This is highly unlikely given that sub-census populations that reflect certain crops and/or geographic areas would be contacted. Further, not every member of a respective population is expected to respond. Assuming this universe, however, the total burden hours over the three-year period are not expected to exceed 18,393 burden hours (see Table A-3 below). If USDA chooses to seek another renewal of this Information Collection Request, updated burden estimates will be supplied to OMB.

For the purposes of estimating and budgeting for the overall 3-year burden for this Generic Clearance, basic assumptions have been made, as outlined in Table A-3 below. Each information collection request submitted under this Generic Clearance will provide the specific estimates of burden related to that particular information collection request, along with an explanation of how those estimates were determined.

We estimate the maximum total dollar value of the burden hours for this collection (over a three-year period) to be approximately \$808,000, or \$269,334 annually. This figure was arrived at by multiplying the estimated total burden hours over a three-year period (i.e., 18,393 hours) by \$43.93, i.e., the most recently reported average employer costs for employee compensation for the third quarter of 2023.¹

¹ https://www.bls.gov/news.release/archives/ecec_12152023.pdf

Table A-3. Respondent Burden Estimates

Respondent group¹	ASA CCAs	NAICC	Extension (NACAA)	Other	Total
(a) Sample size²	10,270	604	3,259	1,000	15,583
(b) Annual waves of data collection³	8	8	8	2	10
(c) Respondent count per collection⁴	1,608	91	489	150	2,337
(d) Total annual responses (waves x respondent count)	12,864	725	3,911	300	17,800
Minutes / Respondent	15	15	15	15	15
Burden Hours	3,216	181	978	75	4,450
Total annual non-responses (waves x non-respondent count)	9,112	513	2,770	850	13,246
Minutes/non-respondent	1	1	1	1	1
Burden hours	1,215	68	369	28	1,681
Total responses + non-responses, annually	85,760	4,832	26,072	2,000	118,664
Total burden hours, annually	4,431	250	1,347	103	6,131
Total burden hours, 3 years	13,293	749	4,041	310	18,393

1. American Society of Agronomy, Certified Crop Consultants; National Association of Independent Crop Consultants; Extension professionals associated with the National Association of County Agricultural Agents; Other includes agricultural stakeholders not affiliated with or advised by these groups.
2. Sample size is based on total membership of these organizations, but it may be possible to narrow sample size to smaller number of recipients based on expertise in a specific crop and/or pest management area.
3. Based on potential for up to 2 surveys per quarter for 8 total surveys per year. Most surveys would be sent to crop consultants. The Other category reflects rare, niche agricultural stakeholder groups that are not represented by the ASA, NAICC, or NACAA.
4. Based on estimated 15% response rate.

13. **Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

No capital and maintenance costs to the respondents are anticipated.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The annualized cost to the government is estimated based on time spent on this effort over a typical survey. The time committed by OPMP towards this effort is limited by its funding and staff. A majority of this survey effort will be conducted by a GS-14, Step 4 employee, whose time is valued at \$73.47 per hour (per the 2024 OPM General Schedule Salary Table). Using a multiplier of 1.6 (based on total compensation for federal employees with professional/doctorate degree)² to account for the costs of benefits, the full cost of compensating this employee is \$117,55 per hour. This staff member would work approximately half time to conduct 8 surveys per year (0.5 FTE or 1,040 hours), which costs \$122,254 annually and \$366,762 over a three-year period.

OPMP was appropriated \$500,000 for use over a five-year period via the 2018 Farm Bill, which requires that this survey effort take place. Less the cost of funds to be allocated to commercial survey companies for survey platforms and/or panel data, the remainder may be used for labor, which was initially provided by an honorary fellow from the American Association for the Advancement of Science (AAAS fellow) and is currently supplied by OPMP employees.

Time commitments from OPMP staff that are indirectly involved in this effort are assumed to be limited to one hour per staff person per data collection, which is the typical amount of time staff has spent reviewing data collections in the past. Most science staff in OPMP are GS-15. A GS-15, Step 4 employee earns \$86.42 per hour (per the 2024 OPM General Schedule Salary Table). Accounting for benefits, loaded wage rates are \$138.27. Currently, there are eight science staff in OPMP, and four on average are expected to review the survey questions. The scientists' efforts are valued at \$553.09 per survey (4 hours), of which there are expected to be 8 per year (32 hours total = \$4,425). One hour of managerial labor (provided by a Level III Senior Executive) is required per survey at a loaded hourly rate of \$153.98. The total annual cost of labor for USDA is estimated at \$127,911.

In most cases, four technical GS-13, Step 5 employees (\$102.50/hr loaded wage rate) from EPA's Office of Pesticide Programs (OPP) will be engaged with this effort (a Chemical Review Manager (CRM), a social scientist, a biologist, a science information analyst specialist) and four GS-15, Step 5 branch chiefs (\$142.46/hr loaded wage rate) managing each of the four technical GS-13 employees. Based on estimates from EPA, these individuals have typically spent no more than 1 hour on a specific request. Assuming 8 surveys annually, this equates to \$7,839 annually.

The total estimated annual cost to the Federal government is estimated to be \$230,086 annually, or \$690,258 over the three-year period (Table A-4).

² <https://www.cbo.gov/system/files/115th-congress-2017-2018/reports/52637-federalprivatepay.pdf>

Table A-4. Federal Burden Estimates

Agency / Office	Cost Type	Hourly loaded wage rate	Number of staff	Total burden hours, annually	Total Burden Hours, 3 years	Total Costs, Annually	Totally Costs, 3 years
USDA / OPMP	Technical Labor, Survey Administrator, GS-14, Step 4, 0.5 FTE (1)	\$ 117.55	1	1,040	3,120	\$ 122,254	\$ 366,762
	Technical Labor, Reviewers, GS-15, Step 4	\$ 138.27	4	32	96	\$ 4,425	\$ 13,274
	Managerial Labor	\$ 153.98	1	8	24	\$ 1,232	\$ 3,696
	Other Expenses (survey software)	-	-	-	-	\$ 70,000	\$ 210,000
USDA Total						\$197,911	\$ 593,732
EPA / OPP	Technical Labor, Reviewers, GS-13, Step 5	\$ 102.50	4	32	96	\$ 3,280	\$ 9,840
	Managerial Labor, GS-15, Step 5	\$ 142.46	4	32	96	\$ 4,559	\$ 13,677
EPA Total						\$ 7,839	\$ 23,516
Total Federal Burden						\$205,749	\$ 617,248

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The burden hours and costs have changed from the ICR that was approved in 2021. This is due to several factors: 1) an increase in the number of potential respondents, 2) an increase in wage rates, 3) a decrease in the number of anticipated annual surveys from 16 to 8, and 4) a clerical error in the initial submission regarding the number of annual responses. The summary of adjustments is displayed below in Table A-5.

Table A-5. Summary of Adjustments

	Total Annual Respondents ¹	Total Annual Responses ²	Total Annual Nonresponses ²	Total Annual Burden Hours ³	Labor Wage Rates (Year)	Total Annual Cost
2021 Approved ICR	12,755	30,612	20,408	8,265	\$38.26	\$316,219
2021 ICR with corrected calculations	12,755	30,612	173,468	13,435		
2024 ICR Renewal	15,583	17,800	100,864	6,131	\$43.93	\$269,334
Difference	+ 2,828	- 12,812	+ 80,456	- 2,134	+ \$5.67	- \$46,885
Change due to agency discretion	+ 2,828			- 1,681		
Change due to agency adjustment		- 12,812	+ 80,456	- 453		

1. The change to the number of respondents is due to an increase in total respondents by 1,000 to add another potential category of respondents and a change to the list that OPMP will use to contact extension agents. OPMP initially estimated only 260 extension agents, but the list obtained from NACAA contains more than 3,000 respondents.
2. The change to the total number of annual responses is due to: 1) a decrease in the total number of anticipated annual surveys from 16 to 8 and 2) a correction to the 2021 ICR that adjusts the response rate and the total number of surveys. The 2021 ICR used a response rate of 60% in the burden calculations, but OPMP use of this ICR has indicated that 15% is more appropriate, and the total burden was based on only 4 surveys per year despite stating that 16 surveys per year were intended. Both of these are captured as an agency adjustment. The total number of annual responses for 2024 is based on 15,583 being contacted 8 times with 15% response rate.
3. The total burden hours are based on 15 minutes per response and 1 minute per nonresponse. The original ICR estimated 2 minutes per nonresponse. OPMP staff estimated the time to read the title of the survey and email transmission and concluded that 1 minute was sufficient to determine whether the questions would be relevant. The change in the burden is due to agency discretion: the change in the number of responses and nonresponses from adjusting the response rate in the calculations, the change in nonresponse time from 2 minutes to 1 minute, and the reduction in the annual number of surveys from 16 to 8.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Each information collection considered under this generic clearance will describe how the data will be used and will provide to OMB the specific methods used to synthesize, tabulate, and aggregate data collected. OPMP does not plan to make use of these data in statistical analyses beyond simple tabulations for reporting purposes.

For publication purposes, results will be aggregated by geographic regions that correspond to the data need (e.g., state level, corn-belt region, etc.) and to the degree needed to mask individual responses. If five or fewer responses are used to estimate a summary statistic, then that summary statistics will not be published publicly. This disclosure standard is similar to the standards used by NASS to preserve the confidentiality of respondents' responses. In such cases, a public notice will be made to notify interested parties about withheld data.

This project is ongoing and will span the entire information collection three-year time period. Publications for each information collection will be made public on OPMP's website. An annual report of results across all information collection requests for each calendar year will also be supplied to OMB and posted on the OPMP website.

OPMP will strictly follow both requirements set forth by USDA's Office of the Chief Information Officer (OCIO) and standards within the White House's 2001 "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies."

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.

The valid OMB control number and expiration date will be displayed on all information collection instruments.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.

These activities will comply with the requirements in 5 CFR 1320.9.

19. How is this Information collection related to the Customer Service Center?

It is not related.