



United States Department of Agriculture
National Agricultural Statistics Service



June 3, 2024

Rural Coalition
1029 Vermont Ave NW #601
Washington, DC 20005

Dear Sir or Madame:

Thank you for the letter of support of, and some of your findings from, previous Tenure, Ownership and Transition of Agricultural Land (TOTAL) surveys and the 2022 Census of Agriculture. Thank you also for your recommendations for the upcoming TOTAL survey. Your recommendations have been provided to the survey team for consideration. A proposed questionnaire and supporting statements will be made available later this summer for a 30-day public comment period. A Federal Register Notice for OMB Control Number 0535-0240 will be published when that happens followed by instructions on how to review and comment further on the survey before the Office of Management and Budget (OMB) takes official action on approving the survey.

Your submitted letter included some recommendations for the upcoming TOTAL survey. NASS conducted two qualitative research projects over the past year to investigate legal entities for agricultural landowners with the following goals in developing the 2024 TOTAL questionnaire, which helped us:

- learn about data needs from some members of our data user community;
- understand the respondents' comprehension of questions and terminology;
- understand barriers to the retrieval of information requested on the questionnaire, including any record keeping practices;
- observe the respondents' judgement and communication of the information requested, and how to align with response to the question/questionnaire's intent, and;
- glean ways to reduce respondent burden while maximizing overall response strategies.

To address some of your recommendations:

Page 1 of your letter mentions, "In the upcoming TOTAL survey we urge NASS to include the study required under Sec. 12607 of the 2018 Farm Bill that covers land tenure, land transitions, barriers to entry for socially disadvantaged (SDA) and beginning farmers, and farm profitability and viability. The 2024 TOTAL survey coupled with the Access to Farmland report can provide valuable data on the degree to which land is held in absentee ownership, or in undivided interests with no administrative authority (heirs property)." One finding from our qualitative researchers was that absentee landowners with no involvement with the agricultural operation are unlikely to

respond to a survey like the TOTAL, given that the survey will be sent to names and addresses associated with the land. Under these constraints, it is difficult to identify absentee landlords to serve as survey respondents, which would be the only path to obtain the desired information about absentee landlords.

Page 5 of your letter mentions, “The next TOTAL survey data will be improved with a wider range of definitions and categories included to better understand the various types of corporate or real estate trust farmland ownership. We recommend this data break be collected and analyzed in a way that makes clear the diversified kinds of land holdings of all non-farm operator entities.” One finding from the cognitive test was that distinguishing between legal entities and “private” owners is not straightforward, which affects respondents’ understanding of their reporting unit. Work was done to improve the legal entity lines of questioning to help the respondent clearly understand what land is being referred to for the legal entity during the remainder of the interview.

Page 7 of your letter mentions, “Many people and genders make up corporations and trusts, these entities cannot be assigned to a group of individuals, these types of ownership arrangements are necessarily excluded from the demographic data calculations. Revisions to the data collection process for corporations, trusts, hedge fund firms, and investment firms is necessary to ensure they are counted separately and with no exclusions.” As mentioned earlier, work was done to improve the legal entity lines of questioning to help the respondent clearly understand what land is being referred to for the legal entity during the remainder of the interview. Demographics are planned to be collected from the senior partner of the legal entity, which was not part of the previous TOTAL Survey.

Page 8 of your letter mentions, “We strongly recommend the use of a comprehensive data collection process for all corporate-owned farmland to help policy makers understand the various types of land ownership be they a trust, an investment group, hedge fund firm, or individual or entity landlords. Landlords whether individual or entity.” NASS utilizes multiple data collection methods for its surveys. The first method will likely be by mail (with a Computer-Aided Self-Administered Interview option). Operators who do not respond by a certain time will be attempted by either a phone or field enumerator for an interview. The phone enumerators will use a Computer Assisted Telephone Interview (CATI) system. The field enumerators are equipped with Apple iPads and will conduct a Computer Assisted Personal Interview (CAPI). This is done to maximize the number of complete reports possible with the goal of publishing as many summarized statistics as possible while protecting respondent confidentiality.

As mentioned earlier, work was done to improve the legal entity lines of questioning to help the respondent clearly understand what land is being referred to for the legal entity during the remainder of the interview, which we believe will result in better and richer data being collected.

Page 9 of your letter mentions, “We further urge USDA to request full funding for the TOTAL Survey and of the authorized funds to conduct the Section 12607 Land Tenure Study. We further recommend that NASS collect data that will allow better understanding of the types of entities that are investing in land whether by farmland ownership by corporate, trust, partnership, hedge fund, and or other investment and that also examine the degree to which land that is held in undivided interests moves to absentee ownership. We further urge NASS to continue to employ the analysis begun in the 2022 study that analyzed variations including by race, ethnicity and gender.” The TOTAL survey is conducted when funding is available. Realize that a survey of land tenure arrangements comes at a significant cost and requires a tremendous amount of human capital.

We will keep you informed of any other modifications through Federal Register Notices.

Sincerely,

Lance Honig
Chair, Agricultural Statistics Board
U.S. Department of Agriculture
National Agricultural Statistics Service