1Supporting Statement – Part A

MINK SURVEY

OMB No. 0535-0212

In an effort to increase the transparency of NASS's survey processes and provide information on the quality of its estimates, NASS publishes Methodology and Quality Measures Reports for some commodities. The Methodology and Quality Measures Reports are published at the same time or shortly after estimates are released.

This supporting statement incorporates data and methodology from the NASS 2024 Mink Methodology and Quality Measures Publication located at https://www.nass.usda.gov/Publications/Methodology_and_Data_Quality/Mink/08_2024/minkqm24.pdf

Every five years NASS conducts a program review following the completion of the Census of Agriculture. NASS considered public input requested through a program review announcement released on Dec. 19, 2023 for these changes.

The mink program changes are summarized in the following Agricultural Statistics Board Notice:

April 4, 2024 “NASS announces program changes following five-year review” at this link: https://www.nass.usda.gov/Newsroom/Notices/2024/04-04-2024.php

A. JUSTIFICATION

The National Agricultural Statistics Service (NASS) is asking for an extension of 3 years to the ongoing annual data collection and publication of Mink data. This is a voluntary data collection.

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 function of the National Agricultural Statistics Service (NASS) is to prepare and issue official state and national estimates of crop and livestock production, disposition, and prices. Mink figures are a basic part of the NASS strategic plan to cover all agricultural receipts. There are no other accurate

sources for this type of information. Before 1970, sporadic efforts were made within the industry to obtain information. The results were fragmentary, with limited response, and the findings were inconclusive. Therefore, Congress directed NASS to conduct the first Mink Survey in 1970 and the agency has conducted a survey every year since then with the exception of 2012; due to the government sequestration the Mink report was suspended.

Scope and Purpose: The Mink Survey is conducted annually, which includes all States with known mink operations. Data are collected on the number of pelts produced, females bred, the components of the totals by color class, and sales. Marketing data for the price per pelt and the value of mink production are collected from auction houses and incorporated as part of the publication. The publication contains estimates for four other States in the July 2023 publication and two other States in the July 2024 publication, which are combined into an “Other States” category. After each Census of Agriculture, which is an exhaustive data collection effort for all known agricultural operations across the United States, the list of published States is evaluated and modified to include the largest mink producing States.

Figures on mink production are published for the 10 major states that account for slightly more than 90 percent of the total U.S. pelt production; estimates for the remaining states are published in a combined "Other States" category. In 2023 US producers sold just over $39.2 million dollars, worth of pelts.

General authority for these data collection activities is granted under U.S. Code, Title 7, Section 2204. This statute specifies that "The Secretary of Agriculture shall procure and preserve all information concerning agriculture which he can obtain ... by the collecting of statistics ... and shall distribute them among agriculturists."

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.

The mink program consists of two surveys: An annual census of all known mink producers in the 50 states (the Mink Survey) and an annual survey of the prominent mink pelt auction houses (the Mink Price Survey). Response to both surveys are voluntary. Data from the Mink Survey is used by NASS to estimate the number of mink pelts produced and the number of females bred to produce kits the following year, by color class. Data from the Mink Price Survey is used to calculate an average market price. Total value of pelts produced is derived by combining data from the two surveys.

This data is disseminated by NASS in the *Mink* report and is used by the U.S. Government and other groups as described below.

Federal Government: The USDA's Economic Research Service (ERS) uses the data to help determine total value of sales and total cash receipts from agriculture at the state and U.S. levels. The Commerce Department's Office of Consumer Goods uses the report to answer inquiries from Congress. The Foreign Agricultural Service (FAS) which administers the targeted Export Assistance Program authorized by the Food Security Act of 1985 finds the annual *Mink* production report very useful because most of the U.S. mink production is exported. The report provides FAS marketing specialists data on the availability of pelts when working with the industry to promote pelt exports, detects trends in the U.S. mink industry relative to other supply sources, provides a basis for projecting future availability, and provides information to respond to inquiries from other government agencies and commercial traders.

State Governments: State Departments of Agriculture in Idaho, Illinois, Iowa, Michigan, Minnesota, Montana, Ohio, Oregon, Pennsylvania, Utah, Washington, and Wisconsin utilize information from this report to administer voluntary fur farm licensing programs, determine total income from agriculture, provide an indicator for fish and meat animal products, administer health regulations for mink, and refute the misconception that most mink fur comes from trapping.

Farmers: Mink produce kits (offspring) once a year, which means farmers must plan years in advance for the size of their future operations and color of mink they will raise. The *Mink* report gives production totals by color class so that breeders know how many kits of each color were produced in the preceding year and how many females were bred to produce kits of each color in the current year. Over-production within a color can result in flooding the market and reduced returns to growers. With the *Mink* report, individual farmers can make better informed decisions.

Agribusiness Suppliers: The suppliers of animal feed, building materials, and other goods utilize the *Mink* report to anticipate the total requirements in each category and subcategory of products. The U.S. mink industry consumes millions of dollars' worth of fish and fish byproducts, dairy products and dairy byproducts, poultry, and meat byproducts each year. Animal health product manufacturers can anticipate vaccine and other product requirements by studying data in the *Mink* report.

American Agri-Women: This is a national farm women's advocacy organization for Agriculture. The group takes an interest in the fur farming industry's contribution to the overall agricultural economy at the national level, especially as it relates to animal rights issues.

Importance to the Fur Industry: The industry association, Fur Commission USA, uses the information from this program to build and update industry information which is crucial for the Commission to be effective. Cooperative marketing organizations within the mink farming industry rely on NASS' statistics in planning their promotional budgets and campaigns. Employers in the dressing (tanning) trade, brokers and other intermediate merchants, fur garment manufacturers and retailers, and fur trade union groups utilize the annual *Mink* report in planning their capital expenditures, labor requirements, and other business decisions.

Animal Rights Groups and Others: Animal Rights groups use the statistics published in the *Mink* report. They make frequent telephone calls to the USDA to inquire about pelt production, in particular. Foreign interests also use the *Mink* report.

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.

Respondents can complete the Mink questionnaire by any of the following methods: Computer Assisted Self Interview (CASI), Computer Assisted Telephone Interview (CATI), FAX, or by paper/mail. NASS will utilize enumerators to do follow-up contacts either by phone or face to face interviews of non-respondents. In 2024, the response rate using Internet was 8 percent.

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.

The National Agricultural Statistics Service cooperates with state departments of agriculture and land grant universities to conduct agricultural surveys. The surveys meet both state and federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Mink list building includes checks for duplication.

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 information requested can be provided with a minimum of difficulty from normal operating records. Approximately 96 percent of the mink operations in the

sample are small businesses (as defined in the Small Business Administration's Table of Small Business Size Standards:

SBA Table of Size Standards

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.

Conducting this program less frequently than annually would eliminate data needed to keep federal and state agencies, agribusiness suppliers, the fur industry, and other data users abreast of changes within this industry and would erode NASS' list frame.

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 associated with this data collection.

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 Federal Register Notice soliciting comments was published on April 11, 2024, on pages 25559 - 25560. There was one public comment received which was not relevant to the practical utility, time, need or cost of this information collection request.

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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The NASS Data Users Meetings are organized by the National Agricultural Statistics Service in cooperation with the World Agricultural Outlook Board, Farm Service Agency, Economic Research Service, Agricultural Marketing Service, Foreign Agricultural Service, and the U.S. Census Bureau.

These meetings are an opportunity to update data users and the general public on recent and pending changes in the various statistical and information

programs important to agriculture, and to seek comments and input on these programs.

In addition to the Data User Meetings, NASS personnel attend grower meetings and commodity association meetings to keep abreast of the impact of our reports. NASS commodity statisticians also stay in contact with individuals associated with our various surveys to keep informed of any changes within any particular industry.

9. Explain any decision to provide any payment or gift to respondents.

There are no payments or gifts to respondents.

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

Questionnaires include a statement that individual reports are confidential. U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Title III of Pub. L. No. 115-435 (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 Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35” 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.

The following confidentiality pledge statement will appear on all NASS questionnaires.

> The information you provide will be used for statistical purposes only. Your responses will be kept confidential and any person who willfully discloses ANY identifiable information about you or your operation is subject to a jail term, a fine, or both. This survey is conducted in accordance with the Confidential Information Protection and Statistical Efficiency Act of 2018, Title III of Pub. L. No. 115-435, codified in 44 U.S.C. Ch. 35 and other applicable Federal laws. For more information on how we protect your

information please visit: https://www.nass.usda.gov/confidentiality. Response to this survey is voluntary.

11. Provide additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature.

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. 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.

Burden hour calculations are shown below. The minutes-per-response figures came from previous cognitive interviews. Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Reporting time of 42 hours is multiplied by $42.75 per hour for a total cost to the public of $1,796.50.

NASS uses the Bureau of Labor Statistics' Occupational Employment Statistics (most recently published on April 3, 2024 for the previous May) to estimate an hourly wage for the burden cost. The May 2023 mean wage for bookkeepers was $23.84. The mean wage for farm managers was $43.35. The mean wage for farm supervisors was $29.23. The mean wage of the three is $32.14. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of $42.75 per hour.

Estimated Sample Sizes and Respondent Burden for 2025 - 2027											
Survey	Sample Size	Waves of Data Collection	Response				Non-response				Total Burden Hours
			Count	Waves x Count	Min./ Resp.	Burden Hours	Count	Waves x Count	Min./ Non-r	Burden Hours	
Mink Survey - First Mailing *	150	1	45	45	10	8	105	105	2	4	12
Mink Survey - Second Mailing *	105	1	11	11	10	2	94	94	2	3	5
Follow-up Enumeration	94	1	65	65	10	11	29	29	2	1	12
Mink Price Survey	2	1	2	2	30	1	0	0	2	0	1
Publicity Materials	150	1	58	58	5	5	199	199	2	7	12
Total	152		123	123		27	29	228		15	42

* Mailings will include paper versions of the questionnaire, return envelopes, internet access instructions and cover letter.

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

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

14. 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.

The total cost to the Federal government for the annual Mink Program is approximately $135,000. Almost all the total goes to federal personnel wages and benefits; the remainder is for data collection, supplies, postage, computer processing, and similar items.

15. 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).

The expected burden is 42 hours, down 30 hours from the previous approval. The number of responses is 351, down 155 from the previous approval. For the Mink Survey, NASS will continue to do two mailings with either a phone or personal visit to collect the data from non-respondents, allowing NASS to continue to attain satisfactory response rates while minimizing costs. The adjustments to the number of responses and burden hours are due to a decrease in number of producers.

16. 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.

Survey Timeline: Mink data are collected for the previous year's production beginning in late April to mid-May NASS opens the survey for web data collection the day the survey is mailed. Depending on the coding of records by the regions additional data collection will occur via an in-person field visit or by phone. As a rule of thumb, field and phone data collection will begin one day prior to the first day of May. Headquarters (HQ) completes analysis, summarization, and sets estimates over approximately a six-week period ending mid-July. Estimates are released to the public mid-July on the date designated by the Agricultural Statistics Board (ASB) on its annual publications calendar.

Estimators: The Mink Survey is a complete enumeration of all known mink operations. Mink operations are selected from the list of all agricultural operations and new operations are added into the sample when discovered. No coverage adjustment is made. Response to the Mink Survey is voluntary. Producers may refuse to participate in the survey, may not be located during the data collection period, or may submit incomplete reports. The nonresponse data items, and sampling units are manually imputed by HQ statisticians. Since manual imputation is conducted for all nonresponse units and items, point estimates are an accounting of all responses and manual imputations. The measurement of error due to sampling in the current survey period is irrelevant for a fully enumerated census. Moreover, standard errors and coefficients of variation (CVs) are zero for all current data items collected.

Estimation: When all samples are accounted for, all responses are fully edited, and the analysis material is reviewed, HQ executes a summary to evaluate and analyze State and National data. Since the survey instrument is identical all States, the samples can be pooled, and National survey results computed. The summary results provide multiple point estimates and information used to evaluate the quality of the survey estimates, such as response rates. HQ is responsible for performing a detailed review of their survey results. Any irregularities revealed by the summary must be investigated and, if necessary, resolved. Using the historical survey estimates, HQ must validate the survey results and set State and National estimates. The data are viewed in tabular and graphical form. For the National estimates, NASS assembles a panel of statisticians to serve on the ASB. The ASB reviews the National results and establishes the National estimates. State totals sum to the National level. Previous year's estimates are subject to revision when current year's estimates are set. Revisions are the result of late reports or corrected data.

NASS' *Mink* reports can be found here:

https://usda.library.cornell.edu/concern/publications/2227mp65f

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.

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

18. 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.

September 2024