1 Supporting Statement - Part A

CUSTOM WORK SURVEYS

OMB No. 0535-0266

This supporting statement addresses the data collection effort for the Custom Work Survey for a period of three years. This project will concentrate on agricultural operations that have knowledge of rates for custom agricultural work. Custom agricultural work or simply "custom work" is any work completed by others which includes the costs for labor, equipment and fuel for a pre-determined price which will be referred to as a "custom rate." The reference period will be the most recent crop year. The survey is generally conducted every other year for each state but it may be conducted annually depending on the funding. Response will be voluntary.

Data collected under this docket are for cooperative agreements between the National Agricultural Statistics Service (NASS) and other cooperators including North Dakota State University, Oklahoma State University, and Wisconsin Department of Trade and Consumer Protection. The purpose of the survey is to collect custom rates for custom agricultural work.

A. JUSTIFICATION

This survey is being conducted through cooperative agreements with various cooperators. Typically these cooperators are State departments of agriculture or Land Grant Universities under a full-cost recovery basis. These cooperative agreements help NASS to fulfill its mission of providing timely, accurate, and useful statistics in service to United States agriculture. These cooperators often seek NASS's assistance to provide statistics beneficial to agriculture, but are not covered by NASS's annual Congressional appropriation. General authority for conducting cooperative projects is granted under U.S. Code Title 7, Section 450a which states that USDA officials may, "enter into agreements with and receive funds…for the purpose of conducting cooperative research projects…"

NASS benefits from these cooperative agreements by: (1) obtaining additional data to update its list of farm operators; (2) encouraging both parties to coordinate Federal survey activities and activities funded under a cooperative agreement to reduce the need for overlapping data collection and/or spread out respondent burden; and (3) facilitating additional promotion of NASS surveys and statistical reports funded by annual Congressional appropriations.

Respondents benefit from these cooperative agreements by: (1) having their reported data protected by Federal Law (U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Public Law 115-435, Title III (CIPSEA)); (2)

having data collection activities for Federal and Cooperative surveys coordinated to minimize respondent burden; and (3) having high-quality agricultural data that are important to a state or region be collected and published.

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 functions of the National Agricultural Statistics Service (NASS) are to prepare and issue current official State and national estimates of crop and livestock production, disposition, prices, resource use, and to collect information on related environmental and economic factors.

NASS's cooperators have sought NASS's assistance to provide custom rates statistics beneficial to agriculture; these statistics are not covered by NASS's annual Congressional appropriation.

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 collection 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.

NASS will conduct a sample survey of agricultural operations that have knowledge of rates for custom agricultural work. The universe is composed of all active agricultural operations in the states that are conducting a survey. The sampled operations will be asked several screening questions. Those that qualify to respond to the survey will be asked to provide rates for any custom agricultural work for which they have knowledge. Individuals that do not operate a farm or that do not have a knowledge of custom rates will screen out of the survey.

The summarized and published information will be analyzed by the cooperators and data users (often farmers) to investigate rates for custom work which will include:

- Custom Land Tillage,
- Custom Application of Fertilizers and Chemicals,
- Custom Seed Cleaning,
- Custom Hay Hauling,

- Custom Drilling (planting of field crops),
- Custom Seeding and Planting,
- Custom Hay Harvesting
- Custom Silage Making,
- Custom Grain and Peanut Drying,
- Custom Harvesting and Combining,
- Custom Hauling and Trucking,
- Custom Manure Removal and Spreading,
- Custom Feed Preparation,
- Custom Livestock Operations,
- Custom Facility, Tractor or Machine Rental,
- Custom Fence Building, and
- Other.

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.

During this data collection, NASS will mail out a paper questionnaire along with a cover letter and return envelope. There will be instructions to respond via Computer Assisted Self Interviewing (CASI) if the cooperators provide funding to set up this system. Operators who do not respond to this mailing or by CASI will be contacted by a Computer Assisted Telephone Interview (CATI). Data will be collected by trained National Association of State Departments of Agriculture (NASDA) enumerators.

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.

NASS cooperates with State departments of agriculture and Land Grant Universities to conduct agricultural surveys. Whenever possible, these surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry.

Data on custom rates can only be obtained from farm operators; they are not available from any other source. Data on rates for custom agricultural work are of great interest to farmers, governmental agencies, and agricultural organizations. Within the USDA, the National Resource Conservation Service (NRCS) publishes component prices for agricultural materials, machine rental rates, and labor to generate their payment schedules. These component prices are generated from nationally published data sources (i.e., wage rates from the Department of Labor),

commercial databases, and national vendors. Component prices from NRCS are not comparable to the custom rates data this survey will conduct because NRCS rates are a sum of several different components and not a standardized rate. NRCS also does not publish rates that are specific to certain crops or livestock tasks; their rates only apply to the general agricultural sector.

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.

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

Approximately 93 percent or 38,595 of the operations contacted in this survey can be classified as small operations.

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.

Collecting data less frequently would eliminate information needed to keep the farmers and NASS cooperators abreast of custom rate changes at the State level.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with the general information guidelines in 5CFR 1320.5.

There are no other special circumstances that would cause the information collection to be conducted in a manner inconsistent with the general information guidelines in 5CFR1320.5.

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 October 10, 2024 on pages 82204-82205. No public comments were received.

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.

Consultations with economists, researchers, growers, industry associations, and other government agencies such as NRCS are carried out to ensure that data collected reflect all custom rates and the proper timing to obtain accurate information. NASS has received input on custom agricultural work surveys from the following: Alabama Department of Agriculture, Georgia Department of Agriculture, Kansas Department of Agriculture, Mississippi Delta Research and Extension Center, Nebraska Department of Agriculture, North Dakota State University, Oklahoma State University, Pennsylvania Department of Agriculture, South Carolina Department of Agriculture, and Wisconsin Department of Agriculture, Trade, and Consumer Protection.

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

No payment or gifts will be provided 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 come from comparable NASS surveys. Cost to the public of completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 15,027 hours is multiplied by $42.75 per hour for a total cost to the public of $642,404.25.

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 Size and Respondent Burden for the 2025-2027 surveys:

0535-0266 - Projected Respondent Burden for 2025 - 2027													
Commodity	**Sector**	**State**	**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**
Custom Work	Growers and Ranchers	**First Mailing**											
		States funded by Cooperative Agreements	41,500	1	14,525	14,525	20	4,842	26,975	26,975	2	899	5,741
		Subtotal	41,500		14,525	14,525		4,842	26,975	26,975		899	5,741
		Second Mailing	26,975	1	6,744	6,744	20	2,248	20,231	20,231	2	674	2,922
		Phone Follow-Up	20,231	1	11,936	11,936	20	3,979	8,295	8,295	2	276	4,255
Publicity Materials													
Cover Letter and/or EDR Instruction Sheet			41,500		14,525	14,525	5	1,210	26,975	26,975	2	899	2,109
TOTALS			41,500		33,205	33,205		12,279	8,295	55,501		2,748	15,027

1/ A master questionnaire will be used for all Custom Work Surveys.

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

There are no capital/start-up or ongoing operation/maintenance costs associated with this 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 (equipment, overhead, printing, and staff), and any other expense that would not have been incurred without this collection of information.

The survey in this request will be funded by NASS cooperators under a full-cost recovery basis. There will be no cost to the Federal government.

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).

There is no change in response requested. An adjustment of three hours on burden was due to rounding.

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.

The Regional Field Offices (RFO) are responsible for manually editing and processing the questionnaires. The RFOs create and provide editing guidelines and estimation documentation to ensure that all questionnaires are edited and analyzed in a consistent manner. After the data have been key entered and run through computer edits, detailed computer analyses and summaries of the data are provided by the RFOs for evaluation and estimation. Data will be summarized by reporting districts and by state.

In January, estimates of rates for custom work will be published in a Custom Rates report.

2025 Survey:

Survey design.....April – May, 2025
Sample selection.....July, 2025
Questionnaire design.....May – June, 2025
Mail Survey.....August, 2025
Phone Follow-up.....September – November, 2025

End of Data Collection.....November, 2025
Publication.....January, 2026

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.

No approval is requested for 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.

January, 2025