Supplemental Supporting Statement – Part A

**AGRICULTURAL RESOURCE MANAGEMENT, CHEMICAL USE,**

**AND POST- HARVEST CHEMICAL USE SURVEYS**

**Substantive Change**

OMB No. 0535-0218

This substantive change is being submitted as a supplemental supporting statement for changes resulting from the reinstatement of the Tenure, Ownership and Transition of Agricultural Land (TOTAL) for 2024. Every 10 years NASS conducts the TOTAL as a follow-on survey to the 2022 Census of Agriculture and are authorized by the Food, Conservation, and Energy Act of 2008 as amended.

The Agricultural Resource Management Survey (ARMS) Phase 3 (OMB # 0535-0275) will be suspended for a period of one year. The suspended survey will be the 2024 survey that would have been conducted in 2025. The scope of the TOTAL survey is greater than that of the ARMS 3 survey. To maintain the ARMS 3 data series, data will be gleaned from the TOTAL surveys to replace the 2024 ARMS 3 data collection.

As a result of the ARMS 3 data being gleaned from TOTAL, the 2024 Integrated Screening Survey (ISS) will include the screening for the TOTAL. Current screening sample size approved for this ICR is 100,000. This substantive change documents the need for the sample size to be increased.

The overall methodology, publication dates, and data collection plan do not change as a result of the sample size increase.

**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 typical ARMS 3 sample size is large enough to publish State-level estimates for the 15 largest agricultural producing States. The remaining 33 States in the typical ARMS 3 survey are included in the survey to have their data combined in the “all other States” category, so that contiguous US level estimates can be published.

The TOTAL sample will be large enough to publish State level data for the 25 largest agricultural producing States based on value of sales. These 25 core States account for a significant amount of the total value of agricultural products produced in the three-year period of 2020-2022. The remaining 25 States in the TOTAL survey are included to have their data combined in the “all other States” category, so that US level estimates can be published.

Version 2 of the TOTAL survey will target individuals who own and rent out farm land in all 50 States. Individuals who are both farm operators and landlords will be excluded from the Version 2 sample since they are included in the Version 1 sample population. The Version 2 population should be large enough to publish State level data for the 25 core States. The remaining 25 States that will be included in the survey will have their data combined in the “all other States” category, so that US level estimates can be published.

The sample size for the 2024 Integrated Screening Survey will increase to adequately screen for the 2024 TOTAL survey (conducted in 2025).

**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.**

There are no changes from the original approval for the purposes of this change.

**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.**

There are no changes from the original approval for the purposes of this change.

**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.**

There are no changes from the original approval for the purposes of this change.

**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.**

There are no changes from the original approval for the purposes of this change.

**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.**

There are no changes from the original approval for the purposes of this change.

**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 changes from the original approval for the purposes of this change.

**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 soliciting comments on this information collection was published in the Federal Register on December 22, 2022 (Volume 87, Number 245), on pages 78637 - 78638. One comment in support of the ARMS program was received by Dennis Fixler, Chief Economist of U.S. Department of Commerce’s Bureau of Economic Analysis (BEA).

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

There are no changes from the original approval for the purposes of this change.

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

There are no changes from the original approval for the purposes of this change.

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

There are no changes from the original approval for the purposes of this change.

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

There are no changes from the original approval for the purposes of this change.

**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.**

The following table contains the estimated burden hours for the surveys by year and the average annual burden. Totals may vary due to rounding. Cost to the public for completing the questionnaire is assumed to be comparable to the hourly rate of those requesting the data. Average annual reporting time of 52,147 hours is multiplied by $40.51 per hour for a total annual cost to the public of $2,112,474.97.

NASS uses the Bureau of Labor Statistics’ [Occupational Employment Statistics](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.bls.gov%2Foes%2Ftables.htm&data=04%7C01%7C%7C290a56ad685940bf70e208da1e43d90d%7Ced5b36e701ee4ebc867ee03cfa0d4697%7C0%7C0%7C637855573988117488%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000&sdata=9SqQyPp%2F9UHkgRt4ksZSVIVYdh62jn%2BneAczlUj99WI%3D&reserved=0) (most recently published on April 25, 2023 for the previous May) to estimate an hourly wage for the burden cost. The May 2022 mean wage for bookkeepers was $22.81. The mean wage for farm managers was $40.29. The mean wage for farm supervisors was $28.28. The mean wage of the three is $30.46. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of $40.51 per hour.

All of the ARMS surveys are annual surveys, but some respondents will be contacted for more than one of the surveys. Phase 1 is the screening phase for both Phases 2 and 3. Less than 20 percent of the Phase 1 sample will be selected for the Phase 2 survey. The Phase 1 survey is also used to prescreen for the Vegetable Chemical Use Survey. Years where this occurs, the Phase 1 survey will be part of the Integrated Screening Survey. The vegetable and fruit chemical use surveys alternate, so both will never occur in the same year. Burden was calculated using the interview lengths and the targeted response rate of 80 percent. Sample sizes are based on estimates of future needs. Annual burden will fluctuate based on commodity mix. However, accumulated total burden is not expected to exceed the accumulated estimated annual average.

The average annual burden is significantly less than the previously reported burden because the ARMS Phase 3 and Cooperator Funded Chemical Use Surveys will have separate Information Collection Requests.







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

There are no changes from the original approval for the purposes of this change.

**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.**

There are no changes from the original approval for the purposes of this change.

**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 new average annual burden is expected to be 52,147 hours, an increase of 925 hours from the current burden of 51,222 hours due to this substantive change.

The new average number of contacts (416,150) is an increase of 8,752 from the previous number of 407,398.

The Table below gives a more detailed breakdown of the adjustments.



**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.**

There are no changes from the original approval for the purposes of this change.

**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 are no changes from the original approval for the purposes of this change.

**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 changes from the original approval for the purposes of this change.

February 2024