

1 Supporting Statement

LIST SAMPLING FRAME SURVEY

OMB No. 0535-0140

This is a request for renewing the approval of the National Agricultural Statistics Service (NASS) List Sampling Frame Survey for another 3 years. This renewal will include anticipated burden for National Agricultural Classification Survey 2025 (enumerated in 2026) and reworking of the National Agricultural Classification Survey that will be used beginning with the 2024 survey enumerated in 2025.

Included in the attachments are sample questionnaires that NASS will be using. The *National Agricultural Classification Survey (NACS)* is used to identify new operators who will be added to our List Frame. If anyone who completes the NACS identifies that they produce specialty crops, they may receive a follow-up interview. One example is if the operator indicates they produce floriculture or nursery crops, they may receive a follow up interview such as the *Criteria for Horticultural Specialties (CHS)*. The request contains a listing of commodities that might be eligible for follow up. This follow-up will help to improve the sampling for future specialty crop surveys (such as floriculture or nursery). The two-step survey process was developed to help reduce respondent burden. Since most US farmers do not produce specialty crops, we removed these commodities from the NACS and limited them to the follow-on questionnaires.

Changes to the NACS include incorporating the revised Statistical Policy Directive-15 (89 FR 22182 published 3/29/2024) and improvements to the questionnaire with the goal of guiding landlords better in the questionnaire to reduce the chance of landlords reporting the agricultural activity of their tenants.

The *Out of Business Screener (OBS)* will be used in conjunction with other surveys conducted by NASS throughout the year. When a respondent says that they are no longer farming, the NASS enumerator will be prompted to ask these questions to better document the changes in the operator's status. If the respondent is no longer a full-time farmer, but still has some agriculture activities (hobby or personal use) we will need to determine if they qualify as a point farm (produce or have the potential to produce \$1,000 or more in agricultural products). This follow up survey will only be conducted with telephone interviews. Changes include adding a separate agribusiness version of the screener.

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 primary objective of the National Agricultural Statistics Service (NASS) is to provide data users with timely and reliable agricultural production and economic statistics, as well as environmental and specialty agricultural related statistics. To accomplish this objective, NASS relies heavily on the use of sample surveys statistically drawn from the "List Sampling Frame." The List Sampling Frame is a database of names and addresses with control data that contains the component values from which these samples can be drawn.

A broad, yet current, representation of all components of the agricultural sector (small and large farms as well as agribusinesses and specialty farms) is essential in providing accurate statistics for these acreage, production, economic, and environmental surveys. Representation of both small and large farms is also needed to ensure reliable indications for county estimates and to provide a foundation for the Census of Agriculture.

In 1976, Congress appropriated funds for NASS to construct and maintain a List Sampling Frame. A List Sampling Frame system has been developed that includes computer record linkage, automated duplication removal, frame classification, sample selection, mailing, and maintenance. The system is currently operational in all States. Details of our List Frame data can be found in our Systems of Records Notice (SORN) published in the Federal Register.

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

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.

New names and addresses of potential farms or ranches are obtained on a regular basis from grower's associations, other government agencies and various outside sources. Information from these list sources are processed through, and reviewed through a record linkage system at NASS to eliminate any potential duplication and to obtain a listing of new potential farm records. The "new add" records are then contacted with the NACS which will later be used to classify the records according to specific data (size of operation, total acres operated, crop acres, types of livestock, etc.). This information is utilized to define population counts for the various types of farms or ranches (hogs, cattle, equine, crops, specialty agriculture, etc.) and adjust the list frame for under coverage. Additionally, this information will be used to create both probability and non-probability samples for the numerous surveys conducted by NASS.

All types of farms and ranches are represented on the NASS List Sampling Frame. In order to be able to create efficient samples with desired precision of estimation, control data must be kept current and complete. This is especially true for specialty commodities such as fruits and vegetables. Operators who identified themselves as a producer of certain specialty items such as nursery or floriculture crops could also receive the CHS as a follow up specialty criteria survey, which will ask specific items of interest for each respective State.

Records with old or missing control data can also be included in the NACS to keep control data current. Old or missing control data can lead to incorrect inclusion in or exclusion from samples and to inefficient stratification. Also, another important function of up-to-date quality control data are for non-response weighting during the Census or Survey process.

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.**

The NACS questionnaires will be available on the internet. The majority of the data is collected using self-administered questionnaires, i.e., questionnaires sent to the respondent by mail along with internet instructions if available. For the 2021 survey collected in 2022 (collected under OMB control number 0535-0226), there was a 9.1% response rate by internet. If the respondent does not respond by either the internet or the paper form, we will attempt to collect the data by telephone provided that funding is available.

All versions of the questionnaires (internet, paper and Computer Assisted Telephone Interview (CATI)) use skip patterns that move the respondents through the questionnaire as quickly as possible.

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.**

New names and addresses of potential farms or ranches are obtained on a regular basis from growers associations, other government agencies and various outside sources. Information from these new list sources are processed through, and reviewed through a record linkage system at NASS to eliminate any potential duplication and to obtain a listing of new potential farm records.

The National Agricultural Statistics Service cooperates with State departments of agriculture, land grant universities, and other State and Federal agencies to

conduct agricultural surveys. Surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry.

With numerous people entering and leaving the farming industry each year it is crucial that NASS maintains a current list of farm operators to sample from. On each of our surveys that employ a stratified sample, NASS must have an accurate and up to date listing of farmers in order to calculate an accurate expansion or weighting of data to compensate for non-respondents.

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.

In 1975, the USDA, the Office of Management and Budget (OMB), and the U.S. Department of Commerce's U.S. Census Bureau agreed on a definition of a farm that is still in use today. "A farm is currently defined, for statistical purposes, as any place from which \$1,000 or more of agricultural goods (crops or livestock) were sold or normally would have been sold during the year under consideration" (Glossary, 2005). USDA's National Agricultural Statistics Service (NASS) also includes government payments as sales. In other words, a farm is defined as any place with any combination of sales, potential sales, and government payments totaling at least \$1,000. The Small Business Administration describes small farms as farms with less than a certain amount depending on commodity. For the purposes of this ICR, that amount will be the smallest figure (\$2,250,000 gross receipts annually). According to the 2022 Census of Agriculture, there were 1,854,803 farms in the US with market value of Agricultural products sold of less than \$2,500,000. This is 97.6 percent of farms with market value of Agricultural products sold.

Most of the respondents to the NACS are relatively small agricultural establishments. Burden is minimized by using the shorter NACS to collect information for most new or potential agricultural establishments. Only information needed to classify an establishment for the basic survey and census of agriculture purposes are collected. Occasionally, if the establishment reports production of specialty commodities or is relatively large in size the CHS may be used for further follow-up. Although in general, the CHS is used for names from specialty commodity list sources which require more specific data.

Using the same percentage as above, out of the annual average sample size of 481,667 an estimated 470,107 will 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.

Generally, the better the relationship between the data used for sample design and the survey data collected, the smaller the sample size necessary to produce reliable estimates. For efficient samples with desired precision of estimation, control data must be kept current and complete. When developing sample designs, the most important information is (1) the presence or absence of a data item, (2) indication of the age of the data item, followed by (3) some measure of size. This control data determines the usefulness and efficiency of the list as a Sampling Frame. NASS conducts criteria or list building surveys at least annually to maintain a current list sampling frame that is as complete as possible.

Every five years NASS conducts the Census of Agriculture. During that year the criteria or list building surveys are omitted, since the Census data will be used to update the NASS List Frame. The most recent Census of Agriculture referenced the calendar year 2022 and was conducted in 2023. Volume 1 of the 2017 Census of Agriculture was published on February 13, 2023. The next Census of Agriculture will be conducted in 2028 referencing the calendar year of 2027.

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 information 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 Notice soliciting comments was published in the Federal Register on March 7, 2024 on pages 16527-16528. NASS received two public comments in response to this renewal notice. One was from Dr. Dennis Fixler at the Bureau of Economic Analysis (BEA) supporting this data collection. The other was from Ms. Jean Public. The comments are attached to this renewal.

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.

As a part of our regular list building activities, NASS investigates all available lists of farm operators we can access, in order to make our list of potential farmers as complete as possible. Some of the organizations we have received lists from in the past include the USDA Economic Research Service (ERS), the Agricultural Marketing Service (AMS), Environmental Protection Agency (EPA), several State Departments of Agriculture, and some growers associations. These lists are run

through careful screening before any names are added to our List Frame to remove any duplication of records.

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 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. 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.

The following CIPSEA Pledge statement will appear on all future 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>.

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.

The questions asked on the NACS are determined by NASS HQ, since we only use one basic questionnaire version for the entire US. For this renewal, NASS

will use two very similar versions of the NACS questionnaire. There are limited differences between the two versions documented in a supplementary document.

Burden hour calculations are shown below. The minutes-per-response figures come from 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 101,405 hours is multiplied by \$42.75 per hour for a total cost to the public of \$4,335,063.80.

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.

List Frame Surveys

- 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.**

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 annual cost to the Federal government for the data collection and summarization associated with the List Sampling Frame is \$8.5 million.

- 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 estimated annual respondent burden of 101,405 hours and 1,123,567 responses is an increase from the previous approval. The increase resulted from the typical increase in sample for the second and third iterations of the National Agricultural Classification Surveys leading up to the 2027 Census of Agriculture (see question 16 below).

These combined program changes will increase burden hours by 45,608 and increase the number of responses by 509,167 (this includes both completed surveys and refusals or non-responses).

- 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 timeline for the National Agricultural Classification Surveys (NACS) leading up to the 2027 Census of Agriculture is shown below:

NACS, List Building and Census Time Line

| Calendar Year of Data | | Survey Conducted |
|-----------------------------|--|------------------|
|-----------------------------|--|------------------|

Previously, criteria surveys were conducted throughout the year as States discovered potential new farms that could be added to the List Frame using outside sources. Now the shorter, standardized NACS questionnaire is the primary survey and is conducted once or twice a year and States are encouraged to limit the use of the specialty commodity questionnaires (CHS) to only farmers who have indicated the production of specialty crops (fruits, nuts, vegetables, floriculture, nursery, etc.). The NACS and CHS utilize NASS mail centers, and NASS phone centers. There is neither a summarization nor a publication resulting from List Sampling Frame Surveys. Data obtained on the criteria type questionnaires are used by the NASS Frames Maintenance Group in the National Operations Division, in St. Louis, MO to remove duplication and add control data for List Frame sample units. This results in a more efficient Sampling Frame.

- 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.

August 2024