

1 Supporting Statement

STOCKS REPORTS

OMB No. 0535-0007

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 Grain Stocks Methodology and Quality Measures Publication located at https://www.nass.usda.gov/Publications/Methodology_and_Data_Quality/Grain_Stocks/02_2024/gsq0224.pdf.

This is an application for revision and renewal of the Stocks Reports information collection. It contains five types of programs: 1) off farm grain and oilseed stocks, 2) hop stocks, 3) potato stocks and potato processing, 4) rice stocks, and 5) peanut stocks and processing. The peanut stocks questionnaires are mandatory (Title 7, USC 951 – 958), all of the others are voluntary.

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 National Agricultural Statistics Service's primary function is to prepare and issue current, official State and national estimates of crop and livestock production, stocks, disposition, and prices. As part of this function, estimates are made for stocks of off-farm grains and oilseeds, hops, peanuts, potatoes, and rice. Statistics for the set of crops included in this docket are collected because of the large volume produced, high value of production, and significant public interest. General authority for data collection 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."

Grain and oilseed stocks in all positions (on-farm and off-farm) are estimated quarterly. On-farm stocks of grains and oilseeds are collected as part of the Agricultural Surveys Program (OMB No. 0535-0213) while off-farm stocks are

included in this information collection request. Grain stocks estimates are one of the most important NASS estimates, watched closely by growers and industry groups. Off farm grain stocks survey data is provided by elevators, mills, processors, and warehouses. This data is combined with on farm stocks data quarterly to set total grains and oilseed stocks data estimates. These reports provide information to farmers, processors, traders, and State and Federal policy makers on the level of grains and oilseeds available to be moved through marketing channels. This information leads to an orderly marketing of commodities on national and global levels.

As part of the grain and oilseed stocks program, an annual Operation Profile survey is used to maintain a complete and comprehensive list of operations. This profile is also used to identify operations that do not meet the criteria to be included in the Off-farm Grain and Oilseeds Survey.

The hop stocks data provided by brewers, dealers, and growers are used to make national estimates of total hop stocks in the United States on September 1 and March 1. The September report provides the low point of stocks just prior to the current year's harvest production; this stocks level is called the carry-over of past years' production. The March stocks data represents a midpoint in the crop year and provides an indication of crop usage.

Peanut stocks and processing reports are published monthly. The Peanut Statistics Act (Title 7 USC 951-958) requires handlers of raw peanuts, other than the original producers, to submit reports to the Department of Agriculture. The Act states, "The Secretary of Agriculture is hereby authorized and directed to collect and publish statistics of raw peanuts (shelled, unshelled, and crushed), and peanut oil, in the United States, received, processed, shipped, and owned by or in the possession of warehousemen, brokers, cleaners, shellers, dealers, growers, cooperative associations, crushers, salters, manufacturers of peanut products, and owners other than the original producers of peanuts." The law further states: "It shall be the duty of each ... to furnish reports, complete and correct to the best of his knowledge, on the quantity of peanuts and peanut oil received, processed, shipped, and owned by him or in his possession."

Estimates of potato stocks are published every other month during the primary storage season, December through June. These stocks include all potatoes held by growers, processors, and dealers as of the first day of the survey month. Processors are the principal outlet for storage of potatoes--they use about 60 percent of potato production. The difference between total stocks and processing provides a good indication of the stocks available for fresh market, and seed.

Potato processors are contacted every other month between December and June for estimates of potato processing. Potatoes are the most important vegetable crop in the U.S. in terms of value of production and in the top ten of

most valuable crops of any kind raised in this country at around \$4.8 billion annually.

The rice stocks surveys ascertain the location and supply of rice by length of grain. *Rice Stocks* reports are published 5 times per year.

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.

Estimates of stocks provide essential statistics on supplies and contribute to orderly marketing. These estimates are used by farmers and agribusiness firms in their production and marketing decisions. For example, the March 1 estimate of feed grain stocks provides the only reliable indicator of the rate at which the previous harvest of these crops is being used for feed, seed, and other purposes. To take a hypothetical outcome, the knowledge that stocks are declining at an unusually rapid rate causes the commodity price to rise and thus rations the use of the remaining stocks. In the absence of such information, feeding would continue at an ultimately unsustainable rate, causing more drastic adjustments to be necessary near the end of the crop marketing year. In similar ways, transportation companies and the energy industry use the estimates to adjust their activities and commitments to raw product supplies requiring marketing services.

In addition to the private-sector benefits, the Secretary of Agriculture uses stocks estimates to administer farm program legislation and to make decisions relative to the export-import programs. State agencies also use stocks estimates in making decisions relating to the development and administration of agricultural programs.

Measurement of the economic value of these uses of stocks data is a difficult analytical task but several studies have indicated that the collection and dissemination of statistics on crop production and stocks can be expected to have quite large net social benefits. This is not just because of improvements in the efficiency of resource allocation that timely and accurate data make possible but because the public-good characteristics of this information preclude the private sector from devoting sufficient resources to statistical data.

Grain and oilseed stocks reports provide information to farmers, processors, traders, and State and Federal policy makers on the level of grains and oilseeds available to be moved through marketing channels. This information leads to an orderly marketing of commodities on national and global levels.

As part of the grain and oilseed stocks program, an annual Operation Profile survey will have three main functions:

1. Inform the respondent about our data needs so they will have the details to calculate monthly prices and quantities according to NASS definitions.
2. Document items the respondent cannot correctly report or estimate for each quarter.
3. Identify respondents who do not handle any of the commodities of interest.

Hop stocks data are collected with the support of the Hop Growers of America (HGA). This organization is composed of hop producers in Washington, Oregon, and Idaho, which account for over 97% of total amount of hops grown commercially. NASS collects the hops stocks data because there is a high degree of competition among the brewers, dealers, and growers. They will report the data to the USDA because it is impartial.

Peanut stocks and processing reports are published monthly as provided by law. All phases of the industry rely on timely peanut stocks information: processors, shippers, brokers, cleaners, shellers, dealers, growers, cooperative associations, crushers, salters, and manufacturers of peanut products. Under Title 7, USC 951 – 958 all of the peanut stocks and processing surveys included in this information collection request are mandatory. The other stock commodities are voluntary.

Information on potato stocks throughout the crop season is critical to orderly movement of potatoes. Therefore, the USDA makes estimates every other month from December through June in the 13 major States for stocks. Potato production and stocks reports provide a strong basis for contract negotiations between growers and processors. These negotiations come at a time of year that places extra importance on the *Potato Stocks* reports.

Information on potato processing throughout the season is significant component to track the orderly movement of potatoes. USDA, therefore, collects data and makes estimates every other month from December through June in 8 major States for processor usage (CO, ID, ME, MN, ND, OR, WA, WI). Data are collected annually from processors in all other States.

Potato production and stocks reports provide a strong basis for contract negotiations between growers and processors.

Numerous USDA and State agencies use NASS potato production, stocks, price, and disposition statistics to develop research and promote the marketing and use of potatoes. The USDA potato statistical series collected by NASS were used in General Agreement on Trade and Tariff (GATT) talks; the information provided a basis for decisions in marketing and trade by government representatives at the meetings. The Foreign Agricultural Service (FAS) uses NASS potato statistics for the North American Free Trade Agreement (NAFTA) for trade with Canada, Mexico, and South American countries. Certain provisions of this law are triggered by changes in NASS estimates of potato acreage, stocks, and production. The changes are related to duties on Canadian-produced potatoes

imported to the United States. FAS uses all the NASS processing and disposition data to help monitor and promote the export of these products.

The Economic Research Service (ERS) compiles per capita consumption of potatoes, including fresh, canned, frozen, shoestring, and dehydrated. They use NASS processing and stocks reports to include or exclude carry-in and carry-out totals in annual consumption and to arrive at cash receipts for its long-term cash receipts series. ERS estimates cash receipts on a calendar year basis, but potatoes are sold on a crop year basis. NASS data are needed to estimate Farm Income which is included in the National Income Accounts of the U.S. Department of Commerce. These figures are used to derive net farm income estimates, which are required by law.

The Agricultural Marketing Service (AMS) has Federal Marketing Orders for potatoes and is responsible for maintaining a minimum quality for market potatoes. AMS utilizes NASS potato statistics in two of its programs. First, AMS uses NASS statistics to help administer marketing orders and to monitor its potato quality program. For instance, the Federal Marketing Order in Colorado changed its 1987 marketing standards based on NASS potato acreage, stocks, and disposition reports. Second, NASS reports are used in making decisions for the Federal commodity procurement program that deals with providing food for needy persons, schools, etc. The program regulates the distribution of potatoes to these groups. NASS data are also useful in determining where to spend research resources that are channeled through ARS to universities; they help ensure that research projects and allocation of funds are fairly distributed.

NASS potato acreage data are collected on a regular basis and published almost immediately to assist the USDA and State agencies mentioned above in making informed and timely decisions.

Rice stocks statistics are similarly used extensively in the administration of government programs. The Farm Service Agency (FSA) uses estimates of rice production and stocks by length of grain in their loan and purchase program. The Foreign Agricultural Service (FAS) uses data from the *Rice Stocks* report to determine the quantities of rice available for export. Demand for rice is usually for a specific class depending on the country of destination.

- 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.**

Web-based data reporting has been implemented for all of the surveys included in this docket.

To ensure that the intended respondent has access to the Computer Assisted Self Interview (CASI), NASS will mail the respondent a blank questionnaire with a password along with instructions on how to access the CASI. Only the operators who have been selected in the sampled population will have access to the CASI system.

In some cases, the respondent can update data she or he reported in a previous survey by using the CASI, so for this and other data efficiency reasons, we encourage the use of the CASI system.

NASS will customize questionnaires for States whenever possible to minimize respondent burden. Rather than send out the larger questionnaire to each respondent asking for crops or stocks that are not available in their State we only ask for the commodities that are relevant for that State. Example: rice is primarily produced in the southern States. We will not ask someone in Washington about Rice. The “Master” questionnaires are generated from the CASI system. They show the full range of commodities that are available for that particular questionnaire.

Rather than submit 43 different State questionnaire versions (New England questionnaire includes Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont - Alaska and Hawaii are excluded) to OMB for review, we submit one sample State version and the Master version to help decrease the work load on OMB to review our questionnaires.

In 2023, 18.6% of the respondents completed the questionnaires by internet.

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. These surveys meet both State and Federal needs, thus eliminating duplication and minimizing reporting burden on the agricultural industry. Data collected on the various stocks' surveys are not available from any other source.

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 can be provided with a minimum of difficulty from normal operating records.

As all of our survey respondents are subjected to the same level of burden, there is no variance in the estimate of the burden across our expected group of respondents.

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.**

Timing and frequency of the various stocks reports have evolved to meet the needs of the industry and yet minimize the burden on the reporting public. Collecting data less frequently would eliminate data needed by government, industry, and farmers to keep abreast of changes at the State and national 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 5 CFR 1320.5.**

The stocks surveys are inconsistent with the guidelines in that a written response is expected in less than 30 days. A telephone follow-up is conducted about 10 days after the questionnaires are mailed out. Information needs to be collected and issued as close to the reference date as possible to be most useful. In addition, the peanut, rice, and potato stocks surveys are conducted more frequently than quarterly.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the remainder of the guidelines in 5 CFR 1320.5.

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 published the Notice soliciting comments on September 10, 2024, appearing on page 73353. The Notice outlined the intent to renew for a three-year period. Two public comments were submitted by Oleta Miller and Jean Public, both of which are included in the ICR package. Since these comments were neither substantive nor relevant to the collection, the agency will take no further action.

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.

Agency personnel regularly attend grower meetings, data user meetings, and commodity association meetings to keep abreast of the impact of our stock's reports. The *Grain Stocks* report is one of the most sensitive reports USDA produces.

Included in this renewal request, NASS is asking for approval to conduct up to 50 cognitive interviews each year for testing purposes. These field tests will focus on improving publicity/mailout materials, encourage respondents to use Computer Assisted Self Interview CASI, and improvements of the paper version.

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.

Average minutes per response for the stock's surveys are based on the amount of data asked on each questionnaire and the time needed for telephone follow-ups. Total hours of burden are shown in the table below.

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 5,757 hours is multiplied by \$42.75 per hour for a total cost to the public of \$246,111.75.

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.

Oilseeds		Quarterly	3,900
Hops	Brewers	Mar	100
		Sept	100
	Growers &	Mar	125

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 will remain at approximately \$1.8 million. About \$1.6 million is for federal salaries, \$100,000 for telephone and field enumeration by associated State employees (of the National Association of State Departments of Agriculture), and \$100,000 for printing, postage, data processing, travel, etc.

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).

Since the previous approval only small adjustments have been made to the surveys included in this information collection request. The changes to the sample sizes and respondent burden are adjustments due to changes in the populations.

Voluntary Surveys	
	Program Change Due Agency Discretion
Annual Number of Responses	
Annual Time Burden	

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.

Data collection relates to the first day of the survey month. Questionnaires are mailed by our Regional Field Offices (RFOs) to be in the hands of the respondents by the first of the month and telephone follow-up begins within the next 7 to 10 days. Data collection is completed around the 15th of the month. Data are collected via mail, web, fax, and phone. Questionnaire data are reviewed for reasonableness in an interactive edit prior to summarization.

The following table shows the title of the various stock's reports covered under this docket with the release dates. Releases are available at any time on the NASS release Web site managed by Cornell University.

<u>Title of Report</u>	<u>Release Dates</u>
<i>Grain Stocks</i>	March, June, September, January
<i>Hop Stocks</i>	March, September
<i>Peanut Stocks & Processing</i>	Monthly
<i>Potato Stocks & Processing</i>	December, February, April, and June
<i>Rice Stocks</i>	January, March, June, August, October

Publications can be found at:

https://www.nass.usda.gov/Publications/Reports_by_Release_Day/index.php

Then select your commodity, then select the date of the data you wish to see.

- 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.

March 2025