

**SUPPORTING STATEMENT**  
**Generic Testing – Local Food Marketing Practices Survey, Organics Survey, and**  
**Grain Stocks Report**  
**OMB No. 0535-0248**

This mini-supporting statement is being submitted to OMB to define the need for conducting qualitative research, in an effort to increase response as well as reduce measurement error in the next/future iterations of three surveys:

- Local Foods Marketing Practices Survey (OMB Control Number 0535-0259), a 2022 Census of Agriculture Special Study planned for crop year 2025. Data collection will most likely occur between December 2025 and April 2026. The survey is part of the Department's continued efforts to support local and regional food systems across the nation. Specifically, it asks producers for information on their production and local marketing of foods. Information includes the value of food sales by marketing channel (i.e. farmers markets, community supported agriculture (CSA) arrangements, restaurants, roadside stands, food hubs, and more), value of crop and livestock sales, marketing practices, expenses, Federal farm program participation, and more.
- Organic Survey (OMB Control Number 0535-0249), a 2022 Census of Agriculture Special Study planned for crop year 2025. Data collection will most likely occur between December 2025 and April 2026. The Organic Survey aims to provide acreage, production, and sales data for a variety of organic crop and livestock commodities as well as organic marketing and agricultural practices. They involve collecting these data from all known organic operations in the United States.
- Stocks Reports (OMB Control Number 0535-0007), specifically the Grain Stocks Report. This is a quarterly survey that is conducted in March, June, September, and December of each year. The Grain Stocks Report contains estimates of grains, oilseeds and pulse crops stored in any commercial facility that is off farm. The surveys are run in every state for major grain and oilseed crops.

**A. JUSTIFICATION**

**1. Circumstances making collection of information necessary.**

The Local Food Marketing Practices Survey is a relatively new study that has undergone many changes. In 2015, nine cognitive interviews were conducted to assess the efficacy of the new information collection. In 2020, eighteen cognitive interviews were conducted to clarify terms used throughout the survey in order to address misclassification issues. Nevertheless, data analyzed from the 2020 Local Food Marketing Practices Survey revealed more issues during data collection such as misreporting on quantity and sales figures used in publications as well as misinterpreting several terms.

Similarly, cognitive interviews have been conducted over the years, but survey

evaluations and data analysis of the most recent Organics Survey revealed evidence of misreporting and misinterpretation. As a result, the survey team reordered question items to improve the flow of the questionnaire. Additionally, the survey will require organic hemp producers to report their information for the first time and there is potential for misreporting resulting from their introduction to this survey project.

The Grain Stocks Report would greatly benefit from an evaluation of its outreach and engagement activities to determine whether each outreach and engagement activity has an impact on the response rates of the survey. NASS headquarters, Public Affairs and the Regional Field Offices (RFOs) have outreach activities that contribute to the impact of the response rates of the GSR, but NASS has not had the opportunity to capture whether these activities are effective or provide any impact to respondents.

These issues, along with other problems identified with the concepts, questions, and question ordering on the questionnaire during previous cognitive testing, submission of post survey suggestions from NASS staff, and data analysis, illustrate the need for further research to reduce potential measurement error related to the questions and concepts in this survey and supplemental materials.

## **2. How, by whom, and for what purpose information is to be used.**

The information gathered through the qualitative research will be analyzed by NASS's Methodology Division Statistics Division, and Census and Survey Division to determine the content, as well as the best way to ask questions about the constructs of interest on the next Local Foods Marketing Practices Survey and Organics Survey.

### Specific Goals for Local Foods Marketing Practices Test

Data analysis of the 2020 data suggests some respondents had difficulty comprehending some questions on the survey and forming responses that satisfied the data requests. As such, survey methodologists at NASS would like to use cognitive interviews to refine the existing questionnaire prior to the next survey iteration. Specifically, NASS survey methodologists would like to answer the following research questions:

- Why would differences emerge between totals reported for sales categories and the sum of their parts?
- What do respondents who sell locally produce and where do they sell it? Does this impact their ability to answer the survey questions?
- How do respondents think of the local foods marketing practices concepts identified in the survey?
- How do respondents talk about marketing their products locally, what terminology do they use?

- Is it the same as our terminology or something different? How and Why?

#### Specific Goals for Organic Survey Test

Preliminary reviews of the questionnaire and feedback from NASS staff revealed several issues requiring research on how respondents are interpreting and reporting to specific question items. The following research questions are guiding cognitive research to address and resolve those issues:

- How will producers interpret and respond to questions intended to measure hemp production now that it is included on the organics survey for the first time?
- How do organic producers report their production and marketing figures? How do they calculate these and how accurate are their answers to these questions?
- How do respondents navigate the newly reordered sections? Do the sections make sense or are they confusing and burdensome? Why?

The information for the Grain Stocks Report will be collected through qualitative interviews and will be analyzed by NASS's Research and Development Division to determine what can be done to modify or improve the outreach engagement. The types of questions used for the qualitative research are shown in Attachment C. Not all questions will be asked of all participants.

#### Specific Goals for Off Farm Grain Stocks Realist Evaluation

The National Agricultural Statistics Service (NASS) Grain Stocks Report (GSR) provides several outreach and engagement activities throughout the year to bolster engagement with respondents to increase response rates. NASS has not historically evaluated these activities to determine whether they are producing the desired effects of increasing responses, establishing partnerships within the survey, or adding new respondents. In addition, these activities are not well documented or deployed in a standardized way.

The goal of this research is to document outreach activities used at both the HQ and RFO levels and evaluate the effect of these activities on Grain Stocks Report (GSR) respondents such that NASS can intervene on activities and maximize impact. The research will answer the following research questions:

- How do the GSR activities align with the overall outreach program and are they connected to the broader objectives of the GSR?
- Do we understand the GSR target audience and is the rationale for engaging them clearly justified?
- What is the length of the outreach engagement? Is there a mechanism described for reaching audiences?
- What are the most effective approaches for encouraging participation

- within the GSR?  
• Are any outreach activities unique to the GSR?

**3. Use of improved information technology.**

The qualitative research proposed will be done on the phone, over Zoom or Teams, or in person by NASS or National Association of State Departments of Agriculture (NASDA) enumerator staff.

**4. Efforts to identify duplication.**

Operators who are selected for the qualitative research interviews will be drawn from NASS's list of known farm operations who fit, or are likely to fit, the screening criteria for the survey. Duplication is removed before operators are added to the NASS list frame. No additional efforts will be taken to identify duplication.

**5. Methods to minimize burden of small businesses.**

For the qualitative research interviews, no special efforts will be made to minimize burden of small businesses. We hope to include operations of all sizes in the qualitative interviews.

**6. Consequence if information collection were less frequent.**

The qualitative research is planned to be conducted during the period between March 2025 and September 2025, as resources become available.

**7. Special circumstances.**

There are no special circumstances associated with this information collection.

**8. Federal register notice and consultation with outside persons.**

Not applicable.

**9. Payments or gifts to respondents.**

There are no payments or gifts to respondents.

**10. Confidentiality provided to respondents.**

The same confidentiality that is applied to all NASS surveys mentioned in the original supporting statements will be applied to data collected during the cognitive interviews and realist evaluation.

**11. Questions of a sensitive nature.**

The Local Foods Marketing Practices Survey and Organics Survey questions related to farm related income, some operating expenses, and demographics could be considered sensitive. These are similar questions to those that have been used on the Local Foods Marketing Practices Survey, and Organics Survey, as well as some other NASS surveys in the past. Conversely, the Grain Stocks Report questions will not include any questions that are of a sensitive nature.

**12. Hour burden and annualized costs to respondents.**

All interviews will be conducted by survey methodologists at NASS headquarters to explore how respondents understand the underlining constructs within the questionnaire, and make sure that the respondents understand the intent of each question and are able to provide the requested information.

The public burden breakout for the projects are as follows:

Local Foods	30 interviews at 90 minutes each =	45 hours
Organic Survey	15 interviews at 90 minutes each =	23 hours
Grain Stocks	40 evaluations at 90 minutes each =	60 hours
TOTAL		128 hours

Reporting time of 128 hours is multiplied by \$42.75 per hour for a total cost to the public of \$5,472.00.

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.

**13. Total annual cost burden to respondents.**

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

**14. Annualized costs to federal government.**

Costs to the Federal Government for conducting the qualitative research interviews are estimated at \$42,000. This will cover expenses for staff payroll, travel, survey analysis, and any other expenses that may be incurred while updating survey materials based on our findings.

**15. Reasons for changes in burden.**

This mini-supporting statement addresses the use of burden to conduct testing for the Local Foods Marketing Practices Survey, Organics Survey, and Grain Stocks Report.

**16. Tabulation, analysis, and publication plans.**

No data will be published from these tests. Data are for internal use only, but results may be shared with stakeholders, and presented at outside conferences or seminars.

**17. Request for approval of non-display of expiration date.**

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

**18. Exceptions to certification statement.**

There are no exceptions to the certification statement.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS:**

**1. Respondent universe, sampling, and response rate.**

NASS will use expert knowledge, list frame data, and survey data to identify operations or operators that meet the screening criteria for the Local Foods Survey, Organic Survey, and Grain Stocks Report. The operators will not be statistically sampled; rather, they will be hand selected based on whether they market foods locally or grow/raise organic crops or livestock, as well as their characteristics, such as demographics, size, number and types of commodities produced, marketing channels they reported using, and geographic location. HQ staff, NASS State Statisticians, Regional Field Office staff, stakeholders, and NASDA interviewers may recruit respondents for the interviews.

**2. Procedures for the collection of information.**

Interviewers will follow standard pretesting techniques as defined in the original Supporting Statement Part A for the Generic Clearance docket (0535-0248).

**3. Information collected adequate for intended uses.**

Operations will be selected based on specific criteria as stated above.

**4. Test of procedures or methods.**

Not applicable.

**5. Individuals consulted on statistical aspects of survey.**

Selection of methods of testing for this qualitative research was done by the Methodology Division; Senior Survey Methodologists are Kathy Ott ([kathy.ott@usda.gov](mailto:kathy.ott@usda.gov); 202-720-1114 and Kenneth Herrell ([kenneth.herrell@usda.gov](mailto:kenneth.herrell@usda.gov); 202-720-3159).

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